

ORIGINAL
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March 7, 1997

Mrs. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

RE: Docket No. 970172-TP

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response and Objections to MCI Telecommunications, Inc.'s First Request for Production of Documents. Please file these documents in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served on the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White
Nancy B. White (2L)

- ACK
- AFA
- APP
- CAF
- CMU *CMU*
- CTR
- EAG
- LEG
- LIN
- OFC
- ROH
- SEC
- WAS
- OTH

Enclosures

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
W. J. Ellenberg

RECEIVED & FILED

Law
EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

02498 MAR-75

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: MCI Telecommunications Corporation's Petition to Reduce CCL to Remove DeRegulated Payphone Investment from the rates of BellSouth Telecommunications, Inc.)	Docket No. 970172-TP
)	
)	Filed: March 7, 1997
)	

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
RESPONSE AND OBJECTIONS TO MCI'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

COMES NOW BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), and files pursuant to Rule 25-22.034, Florida Administrative Code, and Rules 1.280(c) and 1.350 of the Florida Rules of Civil Procedure, its Response and Objections to MCI Telecommunications Corporation ("MCI") First Request for Production of Documents dated February 7, 1997.

GENERAL RESPONSE AND OBJECTIONS

1. BellSouth objects to the requests to the extent that such requests seek to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such requests are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. BellSouth has interpreted MCI's requests to apply to BellSouth's regulated intrastate operations in Florida and will limit its Responses accordingly. To the extent that any request is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission, BellSouth

objects to such request to produce as irrelevant, overly broad, unduly burdensome, and oppressive.

3. BellSouth objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

4. The following Specific Responses are given subject to the above-stated General Responses and Objections.

SPECIFIC RESPONSES

5. With respect to Request No. 1, BellSouth will produce documents that are in its possession, custody, or control that are responsive to Interrogatory No. 4, specifically part of 4(a), 4(b) and 4(e). BellSouth objects to MCI's request with regard to 4(a), 4(c), and 4(d) to the extent those sections of the request deal with revenues. This request is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

6. With respect to Request No. 2, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

7. With respect to Request No. 3, BellSouth has no responsive documents in its possession, custody, or control.

8. With respect to Request No. 4, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place. With respect to the portion of Request No. 4 that

refers to Interrogatory No. 8(c), BellSouth has no responsive documents in its possession, custody, or control.

Respectfully Submitted this 7th day of March, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

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CERTIFICATE OF SERVICE
DOCKET NO. 970172-TP

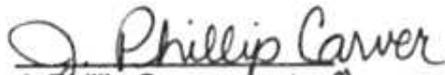
I HEREBY CERTIFY that a true and correct copy of the foregoing was served by
U.S. Mail 7th day of March, 1997 to the following:

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J. Phillip Carver (22)