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July 10, 1997

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

Re: Docket No. 960786-TL

Dear Mrs. Bayo:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response and Objections to The Florida Competitive Carriers Association's Second Request for Production of Documents and Motion for Protective Order which we ask that you file 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 (KR)*  
Nancy B. White

- ACK
- AFA
- APP
- CAF
- CMU  *Greer*
- CTR
- EAG
- LEG  *2*
- LIN  *5*
- CPC
- RCH
- SEC  *1*
- WAS
- OTH

Enclosures

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

RECEIVED & FILED  
*[Signature]*  
EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE  
06954 JUL 10 97  
EPSC-REC/2540/REPORTING

**CERTIFICATE OF SERVICE**  
**DOCKET NO. 960786-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express this 10th day of July, 1997 to the following:

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Nancy B. White (ke)  
Nancy B. White

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of BellSouth )  
Telecommunications, Inc. entry )  
into InterLATA Services pursuant )  
to Section 271 of the Federal )  
Telecommunications Act of 1996 )  
\_\_\_\_\_ )

Docket No. 960786-TL

Filed: July 10, 1997

**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
RESPONSE AND OBJECTIONS TO FCCA'S  
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS  
AND MOTION FOR PROTECTIVE ORDER**

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 Florida Competitive Carriers Association's ("FCCA") Second Request for Production of Documents dated June 20, 1997 and Motion for Protective Order.

**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 FCCA'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

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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. Some of the information BellSouth will be providing to FCCA constitutes "trade secrets" that are privileged pursuant to Section 90.506, Florida Statutes. To the extent that FCCA's document requests request proprietary confidential business information which is not subject to the "trade secrets" privilege, BellSouth moves for a Protective Order and will make such information available to counsel for FCCA pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

#### **SPECIFIC RESPONSES**

Subject to, and without waiver of, the foregoing general responses, BellSouth enters the following specific responses with respect to FCCA's Document Requests:

5. With respect to Item No. 6, BellSouth objects to this document request to the extent there is no time limit and no limitation on the types of systems involved, thereby making each document request unduly burdensome, expensive, or time consuming to attempt a response. In the spirit of cooperation, however, and without waiver of its objection, BellSouth will respond to this

document request with regard to systems identified in the FCC order (provisioning, maintenance, ordering, etc.) that support ALECs and the equivalent systems that support BellSouth Customers. Further BellSouth will respond to this document request with either Florida specific information or generic information applicable to systems used in Florida. Moreover, BellSouth will respond with information created since January 1, 1996. Inasmuch as the information sought is proprietary, BellSouth will provide such information subject to the motion for protective order set forth herein.

Respectfully Submitted this 10th day of July, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

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