

FILE COPY

Legal Department

J. PHILLIP CARVER
General Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404)335-0710

August 22, 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. 960786-TL

Dear Mrs. Bayo:

Enclosed is an original and fifteen copies of BellSouth's Objections and Responses to AT&T's First Request for Production of Documents. We ask that this be filed in the captioned matter.

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,

J. Phillip Carver
J. Phillip Carver (AW)

Enclosures

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

ACK _____
AFA _____
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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of)
BellSouth Telecommunications,) Docket No. 960786-TL
Inc.'s entry into interLATA)
services pursuant to Section 271) Filed: August 22, 1997
of the Federal Telecommunications)
Act of 1996)
_____)

BELLSOUTH'S OBJECTIONS AND RESPONSES TO
AT&T'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

BellSouth Telecommunications, Inc. ("BellSouth") hereby responds to
AT&T's First Request for Production of Documents and states the following:

OBJECTIONS

General Objection Number One: BellSouth objects to POD Request Nos.
1, 4, 5, 6, 8, 11, 15, 18, 18(sic), 20 and 21 in that they are unduly burdensome,
overbroad, and calls for disclosure of information that is not relevant, nor
calculated to lead by discoverable evidence.

The above-referenced requests can only be answered by reviewing every
Order received from any CLEC by BellSouth during the last seven months in the
entire nine state region which BellSouth provides service. This would involve
reviewing approximately eight thousand Orders. To provide documents in
response to these requests, it would be necessary, after reviewing these Orders,
to analyze each one and to determine which information is responsive.
Moreover, these requests would require BellSouth to then separate out the

Orders that relate to Florida and perform the same (in many instances, multi-part) analysis. Inasmuch as these Orders are not currently maintained in a state-by-state basis, this would require the additional task of sorting through the approximately eight thousand Orders to locate the ones that relate to Florida. In light of the foregoing, this process is, without question, unduly burdensome.

Moreover, this extremely burdensome task of locating and reviewing voluminous documentation would have to be performed by those personnel working in, or supporting the functions of, the BellSouth operations that are currently dedicated to providing service on a timely basis to ALECs. Given the scope and the magnitude of the requests and the timeframe in which AT&T has demanded a response, these personnel would have to virtually abandon all of the functions to which they are dedicated in order to answer these requests. This request, therefore, is not only burdensome, but patently unreasonable given the circumstances.

General Objection Number Two: BellSouth objects to answering each Request for Production to the extent that it requires the disclosure of information that is not related to Florida. As set forth previously in BellSouth's general objection filed on August 18, 1997, the pertinent issues in this case relate to whether the fourteen point checklist has been met in Florida. The status of BellSouth's efforts to serve ALECs in other portions of its region are not properly at issue. Given the lack of relevance of this portion of the discovery, combined

with its extreme burdensome nature, BellSouth should not be required to produce any responsive information as to other.

RESPONSES

1. BellSouth objects to producing responsive documents for the reasons set forth in General Objection Numbers One and Two.
2. BellSouth will provide any responsive documents in its possession at a mutually agreed upon time and place.
3. BellSouth will provide any responsive documents in its possession at a mutually agreed upon time and place.
4. BellSouth objects to producing responsive documents for the reasons set forth previously in General Objection Numbers One and Two.
5. BellSouth objects to producing responsive documents for the reasons set forth previously in General Objection Numbers One and Two.
6. BellSouth objects to producing responsive documents for the reasons set forth previously in General Objection Numbers One and Two.
7. BellSouth objects to producing documents that do not relate to Florida for the reasons set forth above in General Objection Number Two. BellSouth will produce any responsive (Florida specific) documents in its possession at a mutually agreeable time and place.
8. BellSouth objects to producing responsive documents for the reasons set forth previously in General Objection Numbers One and Two.

9. BellSouth will provide any responsive documents in its possession at a mutually agreed upon time and place.

10. BellSouth will provide any responsive documents in its possession at a mutually agreed upon time and place.

11. BellSouth objects to producing responsive documents for the reasons set forth previously in General Objection Numbers One and Two.

12. BellSouth objects to producing documents that do not relate to BellSouth Florida operations for the reasons set forth above in response to General Objection Number Two. BellSouth will produce any responsive (Florida specific) documents in its possession at a mutually agreeable time and place.

13. BellSouth objects because this request is overbroad and burdensome. Ms. Calhoun's testimony is based in part upon "information" that she developed during many years of working for BellSouth, as well as direct personal knowledge of the matters about which she testified, and relevant interviews of subject matter experts, including those within BellSouth. It is not possible (and even if it were, it would be extremely burdensome) to produce all information upon which she relies.

14. BellSouth objects because this request is overbroad and burdensome. Mr. Stacy's testimony is based in part upon "information" that he developed during many years of working for BellSouth, as well as direct personal knowledge of the matters about which he testified, and relevant interviews of subject matter experts, including those within BellSouth. It is not possible (and

even if it were) it would be extremely burdensome, to produce all information upon which he relies.

15. BellSouth objects to producing responsive documents for the reasons set forth previously in General Objection Numbers One and Two.

16. BellSouth objects because this request is overbroad and burdensome. The testimony of BellSouth's witnesses is based in part upon "information" that they developed during many years of working for BellSouth, as well as direct personal knowledge of the matters about which they have testified, and relevant interviews of subject matter experts, including those within BellSouth. It is not possible (and even if it were) it would be extremely burdensome, to produce all information upon which they rely.

17. BellSouth objects to producing documents that do not relate to BellSouth Florida operations for the reasons set forth above in response to General Objection Number Two. BellSouth will produce any responsive (Florida specific) documents in its possession at a mutually agreeable time and place.

18. BellSouth objects to producing responsive documents for the reasons set forth previously in General Objection Numbers One and Two.

18. (sic). BellSouth objects to producing responsive documents for the reasons set forth previously in General Objection Numbers One and Two.

19. BellSouth objects to producing responsive documents for the reasons set forth previously in General Objection Numbers One and Two.

20. BellSouth objects to producing responsive documents for the reasons set forth previously in General Objection Numbers One and Two.

21. Inasmuch as BellSouth has objected to responding to AT&T's Interrogatory No. 18(c), no responsive documents were identified.

22. Inasmuch as BellSouth has objected to responding to AT&T's Interrogatory No. 23(e), no responsive documents were identified.

23. Inasmuch as BellSouth has objected to responding to AT&T's Interrogatory No. 24(c), no responsive documents were identified.

24. Inasmuch as BellSouth has objected to responding to AT&T's Interrogatory No. 29(d), no responsive documents were identified.

25. Inasmuch as BellSouth has objected to responding to AT&T's Interrogatory No. 30(b), no responsive documents were identified.

26. BellSouth will provide any responsive documents in its possession at a mutually agreed upon time and place.

27. BellSouth will provide any responsive documents in its possession at a mutually agreed upon time and place.

28. BellSouth objects to producing documents that do not relate to BellSouth Florida operations for the reasons set forth above in response to General Objection Number Two. BellSouth will produce any responsive (Florida specific) documents in its possession at a mutually agreeable time and place.

Respectfully submitted this 22nd day of August, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (w)

ROBERT G. BEATTY

NANCY B. WHITE

c/o Nancy Sims

150 South Monroe Street, #400

Tallahassee, Florida 32301

(305) 347-5555

William J. Ellenberg II (w)

WILLIAM J. ELLENBERG II

J. PHILLIP CARVER

675 West Peachtree Street, #4300

Atlanta, Georgia 30375

(404) 335-0710

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 22nd day of August, 1997 to the following:

Mr. Brian Sulmonetti
LDDS WorldCom Communications
Suite 400
1515 S. Federal Highway
Boca Raton, FL 33432
(407) 750-2529

Floyd R. Self, Esq.
Norman H. Horton, Esq.
Messer, Caparello, Madsen,
Goldman & Metz, P.A.
215 South Monroe Street
Suite 701
P.O. Box 1876
Tallahassee, FL 32302-1876
Atty. for LDDS WorldCom Comm.
(904) 222-0720

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301
Atty. for FCCA
(904) 222-2525

Thomas K. Bond
MCI Telecommunications Corp.
780 Johnson Ferry Road
Suite 700
Atlanta, GA 30342
(404) 267-6315

Richard D. Melson
Hopping Green Sams & Smith
123 South Calhoun Street
P.O. Box 6526
Tallahassee, FL 32314
(904) 222-7500

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs,
Odom & Ervin
305 South Gadsden Street
P.O. Drawer 1170
Tallahassee, FL 32302
Atty. for Sprint
(904) 224-9135

Benjamin W. Fincher
3100 Cumberland Circle
Atlanta, Georgia 30339
Atty. for Sprint
(404) 649-5145

Monica Barone
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Patrick K. Wiggins, Esq.
Donna L. Canzano, Esq.
Wiggins & Villacorta, P.A.
501 East Tennessee Street
Suite B
Post Office Drawer 1657
Tallahassee, Florida 32302
Tel. (904) 222-1534
Fax. (904) 222-1689
Attys. for Intermedia

Patricia Kurlin
Intermedia Comm., Inc.
3625 Queen Palm Drive
Tampa, Florida 33619-1309
(813) 829-0011

Peter M. Dunbar, Esq.
Robert S. Cohen, Esq.
Pennington, Culpepper, Moore,
Wilkinson, Dunbar &
Dunlap, P.A.
215 South Monroe Street
2nd Floor
Post Office Box 10095
Tallahassee, FL 32302
(904) 222-3533

Sue E. Weiske, Esq.
Time Warner Communications
160 Inverness Drive West
2nd Floor North
Englewood, Colorado 80112
(303) 799-5513

Tracy Hatch, Esq.
AT&T
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
(904) 425-6364

Marsha E. Rule, Esq.
c/o Doris M. Franklin
AT&T
101 North Monroe Street
Suite 700
Tallahassee, FL 32301

Andrew O. Isar
Director - Industry Relations
Telecomm. Resellers Assoc.
4312 92nd Avenue, N.W.
P.O. Box 2461
Gig Harbor, WA 98335-4461
(206) 265-3910

Richard M. Rindler
Swindler & Berlin, Chartered
3000 K Street, N.W.
Suite 300
Washington, D.C. 20007
Tel. (202) 424-7771
Fax. (202) 424-7645

Kenneth A. Hoffman, Esq.
William B. Willingham, Esq.
Rutledge, Ecenia, Underwood,
Purnell & Hoffman, P.A.
215 South Monroe Street
Suite 420
Tallahassee, FL 32301-1841
(850) 681-6788

Mr. Paul Kouroupas
TCG-Washington
2 Lafayette Centre
1133 Twenty First Street, N.W.
Suite 400
Washington, D.C. 20036
(202) 739-0030

Laura L. Wilson
Vice President
Regulatory Affairs
Florida Cable Telecomm. Assoc.
310 North Monroe Street
Tallahassee, FL 32301
Tel. (904) 681-1990
Fax. (904) 681-9676


J. Phillip Carver