

FILE COPY

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August 25, 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 Telecommunication Inc.'s Objections and Response to Sprint Communications Company Limited Partnership's Second Request for Production of Documents (No. 3) dated August 13, 1997, which we ask that you file 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,

*Nancy B. White (kr)*

Nancy B. White

Enclosures

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

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU *Creer*
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG *2*
- LIN *5*
- OPC \_\_\_\_\_
- RO \_\_\_\_\_
- SC *1*
- W \_\_\_\_\_

RECEIVED & FILED  
*[Signature]*

DOCUMENT NUMBER-DATE

08574 AUG 25 97

FPSC-RECORDS/REPORTING

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(305)347-5558

August 25, 1997

**Via Federal Express**

C. Everett Boyd, Jr.  
Ervin, Varn, Jacobs,  
Odom & Ervin  
305 South Gadsden Street  
P.O. Drawer 1170  
Tallahassee, FL 32302

**Re: Docket No. 960786-TL - (Section 271)**

Enclosed is BellSouth Telecommunications, Inc.'s Objections and Response to Sprint Communications Company Limited Partnership's Second Request for Production of Documents (No. 3), dated August 13, 1997, in the captioned docket.

Sincerely,

*Nancy B. White (kr)*

Nancy B. White

Enclosures

/vf

cc: All parties of record  
A. M. Lombardo  
R. G. Beatty  
William J. Ellenberg II

DOCUMENT NUMBER-DATE  
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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In Re: Consideration of )  
BellSouth Telecommunications, ) Docket No. 960786-TL  
Inc.'s entry into interLATA )  
services pursuant to Section 271 ) Filed: August 25, 1997  
of the Federal Telecommunications )  
Act of 1996 )  
\_\_\_\_\_ )

BELLSOUTH'S OBJECTIONS AND RESPONSE TO  
SPRINT'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS

BellSouth Telecommunications, Inc. ("BellSouth") hereby responds to Sprint Communications Company Limited Partnership's ("Sprint") Second Request for Production of Documents and states the following:

OBJECTIONS

1. On August 13, 1997, Sprint Communications Company Limited Partnership ("Sprint") propounded upon BellSouth a request to produce all documents that BellSouth produces in response to AT&T's First Request for Production of Documents, dated August 11, 1997. BellSouth hereby adopts by reference the objections that it filed on August 22, 1997, as set forth in its response to AT&T's production request.

2. Moreover, BellSouth additionally objects to Sprint's production request because it was not made within the timeframe set for discovery by this Commission. Specifically, the Second Order Establishing Procedure, dated June 12, 1997 (Order No. PSC-97-0703-PCO-TL) stated specifically that "all discovery

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shall be completed by August 22, 1997" (Paragraph 4). The Order further provides that discovery responses shall be filed within ten days. Since Sprint's request was served on August 13, 1997, a response is due on August 23, 1997, i.e., after the date by which discovery is to be concluded. BellSouth objects to the production request of Sprint for this additional reason.

**RESPONSE**

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

Respectfully submitted this 25th day of August, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (KR)

ROBERT G. BEATTY

NANCY B. WHITE

c/o Nancy Sims

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**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 25th day of August, 1997 to the following:

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