

NANCY B. WHITE
Assistant General Counsel-Florida

BellSouth Telecommunications, Inc.
180 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-6888

September 22, 1997

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32309-0860

Re: Docket No. 97-0000-07

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunication, Inc.'s Objections to Public Counsel's First Request for Production of Documents which we ask that you file in the above-captioned matter.

- ACK _____
- AFA _____
- APP Calwell
- CAF _____
- CMU
- CTR _____
- EAG _____
- LEG _____
- LIN 5
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

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 to the parties s' own on the attached Certificate of Service.

Sincerely,

Nancy B. White (kz)
Nancy B. White

Enclosures

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

RECEIVED & FILED
[Signature]
EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
00635 SEP 22 97
FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE
DOCKET NO. 970682-TI**

**I HEREBY CERTIFY that a true and correct copy of the foregoing was served
via U. S. Mail this 22nd day of September, 1997 to the following:**

**Charles J. Beck
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street
Suite 812
Tallahassee, FL 32399-1400**

**Michael Gross
Office of the Attorney General
Department of Legal Affairs
The Capital, PL-01
Tallahassee, FL 32399-1050**

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

**Andrew Isar
Telecommunications Resellers
Association
Post Office Box 2461
Gig Harbor, WA 98335-4461**

**Nancy B. White (ke)
Nancy B. White**

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed Rule 25-24.845,)
F.A.C., Customer Relations;)
Rule Incorporated, and proposed)
Amendments to Rules 25-4.003,)
F.A.C., Definitions; 25-4.110,)
F.A.C., Customer Billing; 25-4.118,)
F.A.C., Interexchange Carrier)
Selection; 25-4.400, F.A.C.,)
Customer Relations; Rule)
Incorporated.)

DOCKET NO.: 970882-TI

FILED: September 22, 1997

**BELLSOUTH'S OBJECTIONS TO PUBLIC COUNSEL'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

BellSouth Telecommunications, Inc. ("BellSouth"), hereby files, pursuant to Order No. PSC-97-1071-PCO-TI and the applicable Florida Rules of Civil Procedure, its Objections to Office of Public Counsel ("OPC") First Request for Production of Documents, and states the following:

GENERAL OBJECTIONS

1. BellSouth objects to the definitions and instructions in the Request for Production to the extent that they attempt to impose upon BellSouth a duty greater than that imposed by the Florida Rules of Civil Procedure relating to discovery and the case law interpreting those rules.

2. BellSouth objects to each and every discovery request to the extent that it seeks, or would require, the disclosure of information protected by the attorney-client privilege. Without waiver of this objection, BellSouth avers that if any responses are protected by the attorney-client privilege, BellSouth will identify same.

DOCUMENT NUMBER-DATE

09635 SEP 22 5

FPSC-RECORDS/REPORTING

3. Public Council has requested that BellSouth provide information not only for Florida but also for the entire BellSouth region. BellSouth objects to this attempt to obtain information regarding BellSouth's operations outside of Florida. BellSouth objects because this overbroad request for non-Florida specific information converts what is already a burdensome demand for the production of voluminous information into a burden of truly staggering proportion. In an effort to be cooperative, however, BellSouth will produce Florida specific information and Company total and/or summary information, where same exists.

SPECIFIC OBJECTIONS

4. BellSouth objects to Request No. 1, 2, 3, 6 and 9 on the basis that these requests are overbroad in that they seek information for states other than Florida. Moreover, these requests are unduly burdensome and request voluminous materials. In an effort to be cooperative, BellSouth will provide Florida specific information, as well as Company total and/or summary information where same exists.

5. BellSouth further objects to Request No. 9 to the extent that it requires BellSouth to model a special computer program to separate out PIC changes due to slamming from the general pool of PIC changes. BellSouth is investigating whether it can perform this separation.

Respectfully submitted this 22nd day of September, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (KE)

ROBERT G. BEATTY

NANCY B. WHITE

c/o Nancy Sims

150 South Monroe Street, #400

Tallahassee, Florida 32301

(305) 347-5555

William J. Ellenborg II (KE)

WILLIAM J. ELLENBERG II

J. PHILLIP CARVER

675 West Peachtree Street, #4300

Atlanta, Georgia 30375

(404) 335-0711