NANCY B. WHITE Assistant General Counsel-Florida

BeilSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (305) 347-5558 ORIGINAL

September 29, 1997

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 971058-TP (305 NPA)

Dear Ms. Bayó:

notification

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response to Staff's First Request for Production of Documents (No. 1) dated September 4, 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 to the parties shown on the attached Certificate of Service.

Sincerely,

Navcy B. White

CAF

CMU \_\_\_\_ Enclosures

cc: All parties of record

EAG \_\_\_\_\_\_ A. M. Lombardo

LES by all of R. G. Beatty

William J. Ellenberg II

ROH \_\_\_\_

St.: \_\_\_\_

W C

DOCUMENT NUMBER-DATE

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for review of	) DOCKET NO. 971058-TL
proposed numbering plan relief	)
for 305 area code.	)
	) FILED: September 29, 1997

## BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSE TO STAFF'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 to the Staff of the Florida Public Service Commission's ("Staff") First Request for Production of Documents (No. 1) dated September 4, 1997.

## SPECIFIC RESPONSE

 With respect to Request No. 1, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

Respectfully Submitted this 29th day of September, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

ROBERT G. BEATTO NANCY B. WHITE 150 West Flagler Street Suite 1910 Miami, Florida 33130 (305) 347-5555

WILLIAM J. ELLENBERG II
J. PHILLIP CARVER
Suite 4300
675 W. Peachtree St., NE
Atlanta, GA 30375
(404) 335-0711

## CERTIFICATE OF SERVICE DOCKET NO. 971058-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express this 29th day of September, 1997 to the following:

John Bowman, Esq.
Martha Brown, Esq.
Staff Counsel-FPSC
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
Tel No. (850) 413-6199

Mark Herron, Esq.
E. Gary Early, Esq.
Akerman, Senterfitt
& Edison, P.A.
P.O. Box 10555
Tallahassee, FL 32302-2555
Tel. No. (850) 222-3471

Thomas K. Bond MCI Telecommunications Corp. 780 Johnson Ferry Road Suite 700 Atlanta, GA 30342

Richard D. Melson Hopping Green Sams & Smith Post Office Box 6526 Tallahassee, FL 32314

Kenneth A. Hoffman, Esq.
William B. Willingham, Esq.
Rutledge, Ecenia, Underwood,
Purnell & Hoffman, P.A.
P.O. Box 551
Tallahassee, FL 32302
Tel. No. (850) 681-6788
Fax. No. (850) 681-6515

Mr. Paul Kouroupas
Teleport Communications Group, Inc.
TCG-Washington
2 Lafayette Centre
1133 Twenty-First Street, N.W.
Suite 400
Washington, D.C. 20036
Tel. No. (202) 739-0030
Fax. No. (202) 739-0044

Mark K. Logan Bryant, Miller & Olive 201 South Monroe Street Suite 500 Tallahassee, FL 32301 Tel. No. (850) 222-8611

Marsha Rule Tracy Hatch 101 North Monroe Street Suite 700 Tallahassee, FL 32301 Tel No. (850) 425-6364

Lee L. Willis
J. Jeffry Wahlen
Ausley & McMullen
P.O. Box 391
Tallahassee, FL 32302
Attys. for Sprint

Sprint
Thomas C. Foley
850 East Altamonte Drive
Altamonte Springs, FL 32716

Tony Key 3100 Cumberland Circle # 802 Atlanta, GA 30339

Nancy & White (KE)