

Assistant General Counsel-Florida
BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
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(305) 347-5558

ORIGINAL

970281-TL

October 6, 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. 970172-TP, 970173-TP and 970281-TL

Dear Mrs. Bayo:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Responses and Objections to Staff's First Set of Interrogatories (Nos. 1-7), First Request for Production of Documents (Nos. 1-5), and Notice of Intent to Request Specified Confidential Classification, which we ask that you file in the captioned dockets.

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
Nancy B. White

ACK _____
ADA _____
EOP _____
G _____

Enclosures

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

This Notice of Intent was filed with Confidential Document No. 10197-97. The document has been placed in the confidential files pending receipt of a request for confidential treatment.

DOCUMENT NUMBER-DATE

10196 OCT-66

FPSC-RECORDS/REPORTING

[Handwritten signatures and initials]

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by MCI)
Telecommunications Corporation)
for an order requiring BellSouth)
Telecommunications, Inc. to remove)
its deregulated payphone investment)
and associated expenses from its)
intrastate operations and reduce)
the Carrier Common Line rate)
element of its intrastate switched)
access charges by approximately)
\$36.5 million as required by the)
Federal Telecommunications Act)
of 1996.)

Docket No. 970172-TP

In re: Petition by MCI)
Telecommunications Corporation)
for an order requiring GTE Florida)
Incorporated to remove its)
deregulated payphone investment)
and associated expenses from its)
intrastate operations and reduce)
the Carrier Common Line rate)
element of its intrastate switched)
access charges by approximately)
\$9.6 million as required by the)
Federal Telecommunications Act)
of 1996.)

Docket No. 970173-TP

In re: Establishment of)
intrastate implementation)
requirement governing)
federally mandated)
deregulation of local)
exchange company payphones.)

Docket No. 970281-TL

Filed: October 6, 1997

DOCUMENT NUMBER-DATE

10196 OCT-65

FPSC-RECORDS/REPORTING

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
RESPONSE AND OBJECTIONS 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 and Objections to the Staff of the Florida Public Service Commission's ("Staff") First Set of Interrogatories and First Request for Production of Documents dated September 4, 1997.

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 Staff'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 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. The following Specific Responses are given subject to the above-stated General Responses and Objections.

SPECIFIC RESPONSES

5. 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.

6. With respect to Request No. 2, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

7. With respect to Request No. 3, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

8. With respect to Request No. 4, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place subject to the Notice of Intent to Request Specified Confidential Classification filed herein.

9. With respect to Request No. 5, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

Respectfully Submitted this 6th day of October, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (ps)

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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Incorporated to remove its)
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Docket No. 970173-TP

In re: Establishment of)
intrastate implementation)
requirement governing)
federally mandated)
deregulation of local)
exchange company payphones.)

Docket No. 970281-TL

Date Filed: October 6, 1997

**BELLSOUTH TELECOMMUNICATIONS, INC.'s NOTICE OF
INTENT TO REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATION**

COMES NOW, BellSouth Telecommunications, inc. ("BellSouth" or "Company"), and pursuant to Rule 25-22.006, Florida Administrative Code, files its Notice of Intent to Request Specified Confidential Classification.

1. On October 6, 1997, BellSouth filed its Responses to Staff's First Set of Interrogatories and Staff's First Request for Production of Documents dated September 4, 1997 with the Commission containing information considered to be confidential and proprietary to BellSouth in the above captioned docket.

2. The information contained in these documents is proprietary to BellSouth and includes information containing, among other things, cost information. This information is clearly confidential and proprietary under Florida Statutes, Section 364.183 and Rule 25-22.006, Florida Administrative Code.

3. Because this information contains proprietary information, BellSouth is filing this Notice of Intent to Request Specified Confidential Classification, pursuant to Rule 25-22.006(3)(e), Florida Administrative Code, in order to allow the Commission to take possession of the responses without delay. The original of this notice has been filed with the Division of Records and Reporting, and a copy has been served on the Division requesting the information.

Respectfully submitted this 6th day of October, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (ps)

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CERTIFICATE OF SERVICE
DOCKET NO. 970281-TL , 970172-TP and 970173-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U. S. Mail and (*) Hand-delivery this 6th day of October, 1997 to the following:

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