

BENNETT L. ROSS
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December 9, 1997

Ms. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

RE: Docket No. 960833-TP; 960846-TP; 960916-TP

Dear Ms. Bayo:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response and Objections to ACSI's First Request for Production of Documents. Please file these documents in the captioned docket.

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,

Bennett L. Ross (KR)

Bennett L. Ross

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG 2 _____
- LIN 5 _____
- OPC _____
- RCH _____
- SEC 1 _____
- WAS _____
- YTH _____

Enclosures

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

DOCUMENT NUMBER-DATE
12581 DEC-96
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petitions by AT&T) Docket No. 960833-TP
 Communications of the Southern)
 States, Inc., and MCI) Docket No. 960846-TP
 Telecommunications Corporation,)
 MCI Metro Access Transmission)
 Services, Inc., for arbitration)
 of certain terms and conditions)
 of a proposed agreement with)
 BellSouth Telecommunications,)
 Inc. concerning interconnection)
 and resale under the)
 Telecommunications Act of 1996)

In the matter of) Docket No. 960757-TP
)
 MFS Communications Company, Inc.)
)
 Petition for Arbitration Pursuant)
 to 47 U.S.C. § 252(b) of)
 Interconnection Rates, Terms, and)
 Conditions with)
)

BellSouth Telecommunications, Inc.)
)
 In the Matter of) Docket No. 960916-TP
 Petition by American)
 Communications Services, Inc.)
 and American Communications)
 Services of Jacksonville, Inc.)
 for Arbitration with BellSouth)
 Telecommunications, Inc.)
 pursuant to the)
 Telecommunications Act of 1996)

In re: Petition by MCI Metro Access) Docket No. 971140-TP
 Transmission Services, Inc., to Set)
 Non-Recurring Charges for)
 Combination of Network Elements)
 to Set Non-Recurring Charges for)
 Combination of Network Elements)
 with BellSouth Telecommunications, Inc.)
)

Filed: December 9, 1997

DOCUMENT NUMBER-DATE

12581 DEC-95

FPSC-RECORDS/REPORTING

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
RESPONSE AND OBJECTIONS TO ACSI'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS**

BellSouth Telecommunications, Inc. ("BellSouth") files pursuant to Rule 25-22.034, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, its Response and Objections to American Communications Services, Inc. and American Communications Services of Jacksonville, Inc. ("ACSI") First Request for Production of Documents, dated November 25, 1997.

1. With respect to Request Nos. 4-9, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place subject to the Protective Agreement between BellSouth and ACSI.

Respectfully submitted this 9th day of December, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

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CERTIFICATE OF SERVICE
DOCKET NOS. 960833-TP/960846-TP/960757-TP/960916-TP/971140-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by

Federal Express this 9th day of December, 1997 to the following:

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