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February 23, 1998

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

Re: 970808-TL (St. Joseph) InterLATA Access Subsidy

Dear Ms. Bayó:

In accordance with Order No. PSC-98-0300-PCO-TP, BellSouth has reviewed its Revised First Set of Interrogatories and First Request for Production of Documents and sets forth herein the list of Interrogatories and POD requests to which BellSouth believes it must have responses. BellSouth has endeavored to winnow out any duplication pursuant to the Order. It must be noted that BellSouth's offer, as contained herein, should not be construed by GTC as an admission by BellSouth that BellSouth's initial Interrogatories and POD requests were unnecessary. BellSouth is merely making a good faith effort to comply with the Prehearing Officer's request that the parties work together.

ACK _____ To that end, BellSouth lists below the Interrogatories and POD requests
AFA 2 that are absolutely essential to its case, along with any change in language:
APP _____
CAF _____ **Revised First Set of Interrogatories:** 1; 3; 7; 8; 14; 15; 18; 33; 34 (replace
CMU Actual \$5,000 "TPG" with "GTC"); 37 (replace "TPG" with "GTC") ; 42 (measures that saved
CTR _____ \$5,000 or more per the Prehearing Officer's Order); 43; 44; 46; 48; 51; 52; 54;
56; 59; 68; and 69.

EAG _____ **First Set of POD Requests:** 1; 4; 5; 8; 9; 14; 15; 18; 32; 34; 51; and 54.
LEG 1

LIN 5 As stated herein, BellSouth has made a good faith effort to reduce the
OPC _____ amount of discovery in keeping with the concerns expressed by the Prehearing
RCH _____ Officer and GTC. BellSouth believes that the interrogatories and POD requests
SEC 1 listed above contain the absolute minimum of information required by BellSouth
WAS _____ to prepare for the Hearing. The paring of the discovery by BellSouth is set forth
OTH _____ herein solely as an accommodation. BellSouth believes that its initial discovery
remains appropriate, however, BellSouth is always willing to compromise where

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possible. The items listed above represent just that: a compromise and nothing more.

I would appreciate it if Mr. Erwin would respond as to whether his client is willing to at least respond to this bare minimum of discovery.

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,

Nancy B. White (KR)

Nancy B. White

Enclosures

cc: All parties of record
A. M. Lombardo
R. G. Beatty
William J. Ellenberg II
David B. Erwin
Beth Keating

CERTIFICATE OF SERVICE
Docket No. 970808-TL

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

* Fascimile and U.S. Mail this 23rd day of February, 1998 to the following:

Beth Keating
Legal Counsel
Florida Public Service
Commission
Division of Legal Services
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