

NANCY B. WHITE
Assistant General Counsel-Florida

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

March 6, 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:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response to GTC, Inc.'s Motion to Hold Due Date for Interrogatory Responses in Abeyance, which we ask that you file 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 to the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White (ke)
Nancy B. White

ACK _____

AFA _____

APP _____ Enclosures

CAF _____

CMU 2 cc: All parties of record

CTR _____ A. M. Lombardo

EAG _____ R. G. Beatty

LEG _____ William J. Ellenberg II

LIN 1 _____

OPC _____

ROH _____

SEC 1 _____

WAS _____

OTH _____

DOCUMENT NUMBER-DATE

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CERTIFICATE OF SERVICE
Docket No. 970808-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
U.S. Mail this 6th day of March, 1998 to the following:

Beth Keating
Legal Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Mr. David B. Erwin
Young, van Assenderp
& Varnadoe, P.A.
225 South Adams Street
Suite 200
Post Office Box 1833
Tallahassee, FL 32302-1833
Tel. No. (904) 222-7206
Fax. No. (904) 561-6834

Mark R. Ellmer
502 Fifth Street
Suite 400
Port St. Joe, FL 32456

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

Nancy B. White (kr)
Nancy B. White

In re: Petition of BellSouth Telecommunications,) Docket No.: 970808-TL
 Inc., for removal of St. Joseph Telephone and)
Telegraph Company's interLATA access subsidy) Filed: March 6, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'s
 RESPONSE TO GTC, INC.'S
 MOTION TO HOLD DUE DATE
FOR INTERROGATORY RESPONSES IN ABEYANCE**

BellSouth Telecommunications, Inc. ("BellSouth"), hereby files its response to GTC, Inc.'s ("GTC") Motion to Hold Due Date for Interrogatory Responses in Abeyance and in support thereof states the following:

1. BellSouth requests that GTC's Motion be denied. Order No. PSC-98-0300-PCO-TL, issued on February 18, 1998, partially granting BellSouth's Motion to Compel, specifically states that BellSouth's requests for information regarding GTC's earnings are appropriate.
2. Further, the Order specifically encouraged the parties to work together to eliminate unnecessary duplication and ensure that only necessary information was requested. (Order, p. 6). BellSouth has held up its end of this Order, as noted in Exhibit A, a letter to the Commission dated February 23, 1998, in which BellSouth made a good faith effort to comply with the Order. Counsel for GTC, when asked by the undersigned for a response to this letter, indicated that GTC's response consisted of the instant Motion and GTC's Motion for Reconsideration.
3. In addition, the Order specifically held that GTC could submit specific objections to BellSouth's interrogatories and requests for POD regarding

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the scope or burden of the individual requests by March 2, 1998. (Order, p. 6). Thus, GTC's claim that GTC will be in violation of the Order while seeking reconsideration is unfounded.

4. The Order set BellSouth's filing date for testimony for March 9, 1998. GTC has already succeeded in depriving BellSouth of information helpful in formulating testimony. Moreover, GTC is merely attempting to delay the hearing in this matter. The reason is obvious; BellSouth continues to subsidize GTC to the tune of \$120,000 per month until this matter is resolved. BellSouth is not seeking to move any procedural dates, however, BellSouth believes GTC should not be allowed to delay even further.

Respectfully submitted this 6th day of March, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

 (ka)

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c/o Nancy Sims
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Tallahassee, Florida 32301
(305)347-5555

 (ka)

WILLIAM J. ELLENBERG II
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NANCY B. WHITE
Assistant General Counsel-Florida

BellSouth Telecommunications, Inc.
150 South Monroe Street
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(305) 347-5566

EXHIBIT A

February 23, 1998

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0860

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.

To that end, BellSouth lists below the Interrogatories and POD requests that are absolutely essential to its case, along with any change in language:

Revised First Set of Interrogatories: 1; 3; 7; 8; 14; 15; 18; 33; 34 (replace "TPG" with "GTC"); 37 (replace "TPG" with "GTC"); 42 (measures that saved \$5,000 or more per the Prehearing Officer's Order); 43; 44; 46; 48; 51; 52; 54; 56; 59; 68; and 69.

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

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

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