

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Supra Telecommunications) Docket No.: 980119-TP
and Information Systems, Inc., Against)
BellSouth Telecommunications, Inc.)
) Filed: March 30, 1998

BELLSOUTH TELECOMMUNICATIONS, INC.'S
OBJECTIONS TO SUPRA TELECOMMUNICATIONS
AND INFORMATION SYSTEMS, INC.'S FIRST
REQUEST FOR PRODUCTION OF DOCUMENTS

BellSouth Telecommunications, Inc., ("BellSouth" or "Company"), hereby
files, pursuant to Rule 25-22.034 and 25-22.035, Florida Administrative Code,
and Rules 1.340 and 1.280(b), Florida Rules of Civil Procedure, hereby submits
the following Objections to Supra Telecommunications and Information Systems,
Inc.'s ("Supra") First Request for Production of Documents.

The objections stated herein are preliminary in nature and are made at
this time for the purpose of complying with the ten-day requirement set forth in
the procedural order issued by the Florida Public Service Commission
("Commission") in the above-referenced dockets. Should additional grounds for

objection be discovered as BellSouth prepares its Answers to the above-
referenced set of requests, BellSouth reserves the right to supplement, revise, or
modify its objections at the time that it serves its Answers on Supra. Moreover,
should BellSouth determine that a Protective Order is necessary with respect to
any of the material requested by Supra, BellSouth reserves the right to file a
motion with the Commission seeking such an order at the time that it serves its
Answers on Supra.

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DOCUMENT NUMBER-DATE
03681 MAR 30 98
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GENERAL OBJECTIONS

BellSouth makes the following General Objections to Supra's First Request for Production of Documents which will be incorporated by reference into BellSouth's specific responses when its Answers are served on Supra.

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 Supra's requests to apply to BellSouth's regulated intrastate operations in Florida and will limit its Answers 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 each and every request and instruction to the extent that such request or instruction calls for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. BellSouth objects to each and every request insofar as the request is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of

these requests. Any Answers provided by BellSouth in response to Supra's request will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth objects to each and every request insofar as the request is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. BellSouth will attempt to note each instance where this objection applies.

6. BellSouth objects to Supra's discovery requests, instructions and definitions, insofar as they seek to impose obligations on BellSouth that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

7. BellSouth objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

8. BellSouth objects to each and every request, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. BellSouth objects to each and every request to the extent that the information requested constitute "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that Supra's requests proprietary confidential business information which is not subject to the "trade secrets" privilege, BellSouth will make such information available to counsel for Supra pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

10. BellSouth is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, BellSouth creates countless documents that are not subject to Florida Public Service Commission or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been provided in response to these discovery requests. Rather, these responses provide all of the information obtained by BellSouth after a reasonable and diligent search conducted in connection with this discovery request. BellSouth conducted a search of those files that are reasonably expected to contain the requested information. To the extent that the discovery request purports to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

SPECIFIC OBJECTIONS

11. BellSouth objects to POD Request Nos. 2, 3, 4, and 7 on the grounds that these requests are overly burdensome and unduly broad.

12. BellSouth objects to POD Request No. 5 to the extent that Supra is requesting the Local Exchange Routing Guide, BellCore is the appropriate entity from which this document should be requested.

13 BellSouth objects to POD Request No. 11 on the grounds that the information requested is not relevant to the issues in this docket nor is it calculated to lead to the discovery of admissible evidence.

Respectfully submitted this 30th day of March, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

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CERTIFICATE OF SERVICE
Docket No. 980119-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served
by U.S. Mail this 30th day of March, 1998 to the following:

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