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April 20, 1998

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

RE: Docket No. 980119-TP (Supra Complaint)

Dear Ms. Bayo:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response and Objections to Supra Telecommunications and Information Systems, Inc.'s First Request for Production of Documents (Nos. 1-12) and Motion for Protective Order, 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 on the parties shown on the attached Certificate of Service.

- ACK
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU Suzanni
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 2 Enclosures
- LIN 3 cc: All Parties of Record
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

Sincerely,

*Edward L. Rankin III (KR)*

Edward L. Rankin III

RECEIVED & FILED  
*[Signature]*  
FPSC-BUREAU OF RECORDS

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FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE**  
**Docket No. 980119-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by (\*) Hand-Delivery and Federal Express this 20th day of April, 1998 to the following:

Beth Keating  
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Florida Public Service Commission  
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Edward L. Rankin, III (KR)

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: April 20, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'s RESPONSE  
AND OBJECTION TO SUPRA'S FIRST REQUEST FOR PRODUCTION  
OF DOCUMENTS AND MOTION FOR PROTECTIVE ORDER**

BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), 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 Response and Objections to Supra Telecommunications and Information Systems, Inc.'s ("Supra") First Request for Production of Documents (Nos. 1-12) to BellSouth dated March 20, 1998.

**GENERAL RESPONSE AND OBJECTIONS**

BellSouth makes the following General Responses and Objections to Supra's First Request for Production of Documents.

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

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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.

#### **MOTION FOR PROTECTIVE ORDER**

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 request 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.

#### **RESPONSES TO SPECIFIC RESPONSES**

Subject to, and without waiver of, the foregoing general responses, BellSouth enters the following specific responses with respect to *Supra's* requests:

1. 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.
2. With respect to Request No. 2, BellSouth objects to this request on the grounds that said request is overly burdensome and unduly broad.
3. With respect to Request No. 3, BellSouth objects to this request on the grounds that said request is overly burdensome and unduly broad.
4. With respect to Request No. 4, BellSouth objects to this request on the grounds that said request is overly burdensome and unduly broad.
5. With respect to Request No. 5, BellSouth objects to the extent said request seeks the Local Exchange Routing Guide. BellCore is the appropriate entity from which this document should be requested. Otherwise, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place subject to the Motion for Temporary Protective Order set forth above.
6. With respect to Request No. 6, 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. 7, BellSouth objects to this request on the grounds that said request is overly burdensome and unduly broad. However, in an effort to be cooperative with Supra's discovery efforts, 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. 8, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

9. With respect to Request No. 9, documents responsive to said request are now available on the BellSouth web page. The Internet address is [www.bellsouth.com/interconnection/markets/local.html](http://www.bellsouth.com/interconnection/markets/local.html).

10. With respect to Request No. 10, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

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

12. With respect to Request No. 12, BellSouth directs Supra to the sources described below where the publicly-available information on the specific charges in question may be found:

- a) General Subscriber Service Tariff, A2.317B & A2.3.8A.
- b) Resale Agreement between Supra and BellSouth.
- c) General Subscriber Service Tariff , A4.
- d) General Subscriber Service Tariff, A4.1,2,3.
- e) No such charge at this time.

- f) No charge for suspending services.
- g) Access Services Tariff E13.3.3.G.
- h) General Subscriber Service Tariff A4.2.4.

Respectfully submitted this 20th day of April, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

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