

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Determination of the Cost of)
Basic Local Telecommunications)
Service, Pursuant to Section 364.025,)
Florida Statutes.)
_____)

Docket No. 980696-TP

Filed: July 17, 998

ATTORNEY GENERAL ROBERT A. BUTTERWORTH'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO BELL SOUTH TELECOMMUNICATIONS, INC.

Robert A. Butterworth, Attorney General, requests BellSouth Telecommunications, Inc. ("BellSouth") to produce the following documents for inspection and copying at the Office of the Attorney General, PL-01 The Capitol, Tallahassee, FL 32399-1050, on or before August 11, 1998, or at such other time and place as may be mutually agreed upon by counsel.

INSTRUCTIONS

1. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which privilege is claimed, together with the following information: date, sender, recipients, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

2. If BellSouth has possession, custody, or control of the originals of the documents requested, please produce the originals or a complete copy of the originals and all copies which are different in any way from the original, whether by interlineation, receipt stamp or notation. If BellSouth does not have possession, custody, or control of the originals of the documents requested, please produce any copies in the possession, custody, or control, however made, of BellSouth.

ACK _____
AFA _____
APP _____
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DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

3. Please construe "and" as well as "or" either disjunctively or conjunctively as necessary to bring within the scope of this production of documents any document which might otherwise be construed to be outside the scope.

4. Words in the past tense include the present, and words in the present tense include the past. Use of the singular includes the plural, and use of the masculine includes the feminine where appropriate, and vice versa.

DEFINITIONS

1. "Document" or "documents" means any written, recorded, filmed or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device or any other media, including, but not limited to memoranda, notes, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, agreements, books, pamphlets, periodicals, appointment calendars, records and recording of oral conversations, work papers, and notes, any of which are in your possession, custody, or control.

2. As used herein "you" and "your" means BellSouth together with its officers, employees, consultants, agents, representatives, attorneys (unless privileged), and any other person or entity acting for or on behalf of BellSouth.

DOCUMENTS REQUESTED

1. All documents requested by Intermedia Communications, Inc.'s First Request for Production of Documents served July 9, 1998, in this proceeding.

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