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98 JUL 21 PM 4:19

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RECORDS AND
REPORTING

July 21, 1998

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

Re: Docket No. 980696-TP (Universal Service - HB4785)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunication's Inc.'s Objections to AT&T's Second Request for Production of Documents, which we ask that you file in the captioned matter.

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.

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Sincerely,

[Signature]
FPSC-BUREAU OF RECORDS

Nancy B. White
Nancy B. White (Pw)

Enclosures

cc: All parties of record
A. M. Lombardo
R. G. Beatty
William J. Ellenberg II

- ACK _____
- AFA 1
- APP _____
- CAF _____
- CML _____
- CTR _____
- EAG _____
- LEG 2
- LIN 5
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- DTH _____

DOCUMENT NUMBER-DATE
07676 JUL 21 98
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Determination of the Cost of Basic) Docket No.: 980696-TP
Local Telecommunications Service, pursuant)
to Section 364.025, Florida Statutes)
_____) Dated: July 21, 1998

**OBJECTIONS OF BELL SOUTH TELECOMMUNICATIONS, INC.
TO AT&T'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS**

BellSouth Telecommunications, Inc. ("BellSouth"), by and through its undersigned attorneys, submits its objections to AT&T Communications of the Southern States, Inc.'s ("AT&T") Second Request for Production of Documents (No. 17) ("AT&T's 2nd PODs"), served on July 16, 1998, by hand delivery, stating as follows:

The objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the five-day requirement set forth in the procedural order issued by the Florida Public Service Commission (the "Commission") (Order No. PSC-98-0813-PCO-TP). The five-day requirement is unprecedented and unduly burdensome. It provides inadequate time to carefully analyze and digest the nature and scope of the discovery requests, especially when the discovery is hand-delivered to BellSouth. Consequently, in order to avoid inadvertent waiver of its objection rights, BellSouth must initially object to all discovery requests. It is not BellSouth's intention by doing so to unduly delay responses to legitimate discovery requests. Should additional grounds for objection be discovered as BellSouth prepares its Answers to this request, BellSouth reserves the right to revise, supplement or modify its objections. Moreover, should BellSouth determine that a Protective Order is necessary with respect to any of the material requested by AT&T, BellSouth reserves the right to file a motion with the Commission seeking such an order.

DOCUMENT NO.

07676-98

3. BellSouth objects to AT&T's 2nd POD No. 17 on the grounds as stated in BellSouth's general objection, as well as on the grounds that the information requested is not relevant and is not reasonably calculated to lead to the discovery of admissible evidence.

Respectfully submitted this 21st day of July, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.


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**CERTIFICATE OF SERVICE
DOCKET NO. 980696-TP (HB4785)**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express this 21st day of July, 1998 to the following:

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