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RECORDS AND
REPORTING

July 28, 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 e.spire™'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.

Sincerely,

Nancy B. White (kk)
Nancy B. White

RECEIVED & FILED

[Signature]
FPSC-BUREAU OF RECORDS

Enclosures

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

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FPSC-RECORDS/REPORTING

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 e.spire™, BellSouth reserves the right to file a motion with the Commission seeking such an order.

General Objections

1. BellSouth objects to each of e.spire's™ 2nd PODs on the grounds that they relate to a cost proxy model which BellSouth has not yet proposed in any filing with this Commission. That BellSouth may have filed such a cost proxy model, or any cost proxy model, with the Federal Communications Commission ("FCC")/State Joint Board, or with any other state regulator, is not dispositive. The fact remains that until BellSouth has in fact filed a cost proxy model with this Commission in this proceeding, e.spire's™ 2nd PODs are premature. No such discovery should take place until after BellSouth has filed its cost proxy model. To do otherwise would place an unreasonable burden on BellSouth to redirect limited resources from completing the filing required on August 3, 1998.

Production of Documents

2. BellSouth objects to e.spire's™ 2nd POD, Nos. 3 and 4 on the grounds that these requests are premature, not reasonably calculated to lead to the discovery of admissible evidence, and is not relevant to the subject matter of this action.

Respectfully submitted this 28th day of July, 1998.

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(+) Protective Agreements