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Legal Department

J. PHILLIP CARVER
General Attorney

98 JUL 29 PM 4: 29

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0710

RECORDS AND
REPORTING

July 29, 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. 980281-TP MCI Complaint

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Responses to MCImetro's First 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.

ACK	_____	RECEIVED & FILED
AFA	_____	
APP	_____	FPSC-BUREAU OF RECORDS
CAF	_____	
CMU	_____	
CTR	_____	JPC/ds
EAC	_____	
LEG	_____	cc: All parties of record
LIN	_____	A. M. Lombardo
OPC	_____	R. G. Beatty
RCH	_____	William J. Ellenberg II
SEC	_____ 1	
WAS	_____	
OTH	_____	

Sincerely,

J. Phillip Carver (re)

J. Phillip Carver

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE
Docket No. 980281-TP**

ORIGINAL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served
via Federal Express this 29th day of July, 1998 to the following:

Catherine Bedell
Legal Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6197
Fax. No. (850) 413-6250

Hopping Law Firm
Richard Melson
P.O. Box 6526
123 South Calhoun Street
Tallahassee, FL 32314
Tel. No. (850) 222-7500
Fax. No. (850) 224-8551

MCI Metro Access Transmission
Services, Inc.
Dulaney L. O'Roark III
780 Johnson Ferry Road
Suite 700
Atlanta, GA 30342
Tel. No. (404) 267-5789
Fax. No. (404) 267-5992

J. Phillip Carver (KR)
J. Phillip Carver

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of MCImetro Access)
Transmission Services, Inc. against) Docket No. 980281-TP
BellSouth Telecommunications, Inc.)
For Breach of Approved)
Interconnection Agreement) Filed: July 29, 1998
_____)

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES
TO MCImetro'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

COMES NOW, BellSouth Telecommunications, Inc. ("BellSouth"), and files pursuant to Rule 25-22.034, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, its Responses to MCImetro Access Transmission Services, Inc. ("MCImetro") First Request for Production of Documents dated June 29, 1998.

SPECIFIC RESPONSES

1. In response to MCImetro's Request for Production No. 1, BellSouth agrees to produce the requested documents. BellSouth also notes that all responsive documents are included within Production Request Nos. 2 and 3.
2. In response to MCImetro's Request for Production No. 2, BellSouth agrees to produce the requested documents.
3. In response to MCImetro's Request for Production No. 3, BellSouth agrees to produce the requested documents.
4. In response to MCImetro's Request for Production No. 4, BellSouth states that the requested documents are currently being finalized. BellSouth

anticipates that they will be completed by August 4, 1998. If so, BellSouth will produce them at that time.

Respectfully submitted this 29th day of July, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (re)

ROBERT G. BEATTY
NANCY B. WHITE
c/o Nancy H. Sims
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(305) 347-5555

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