

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the Cost)	
of Basic Local Telecommunications)	Docket No.: 980696-TP
Service, pursuant to Section 364.025,)	
Florida Statutes)	
<hr/>) Dated: July 30, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES AND
OBJECTIONS TO AT&T'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS**

BellSouth Telecommunications, Inc. ("BellSouth"), hereby files pursuant to Rule 25-22.034, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, its Responses and Objections to AT&T of the Southern States, Inc.'s ("AT&T") First Request for Production of Documents dated July 10, 1998.

GENERAL RESPONSE

1. In any instance in which BellSouth agrees to produce documents, they will be produced at a mutually agreeable time and place. In instances in which the documentation is so voluminous that copying or transporting the documents would be burdensome, BellSouth will make the documents available for review upon BellSouth's premises in Atlanta, Georgia.

SPECIFIC RESPONSES

1. In response to AT&T's Request to Produce No. 1, BellSouth agrees to produce the requested documents. All responsive documents have been

DOCUMENT NUMBER-DATE

08043 JUL 30 98

FPSC-RECORDS/REPORTING

attached to BellSouth's Answer to Interrogatory No. 2 of AT&T's First Set of Interrogatories.

2. In response to AT&T's Request to Produce No. 2, BellSouth states that there are no responsive documents. Since the Florida Public Service Commission no longer prescribes depreciation rates, there are no documents responsive to this request.

3. In response to AT&T's Request to Produce No. 3, BellSouth agrees to produce the requested documents.

4. In response to AT&T's Request to Produce No. 4, BellSouth agrees to produce the requested documents.

5. In response to AT&T's Request to Produce No. 5, BellSouth agrees to produce the requested documents.

6. In response to AT&T's Request to Produce No. 6, BellSouth agrees to produce the requested documents. BellSouth notes that all responsive documents are also responsive to Request to Produce No. 5.

7. In response to AT&T's Request to Produce No. 7, BellSouth agrees to produce the requested documents. BellSouth notes that all responsive documents are also responsive to Request to Produce No. 5.

8. In response to AT&T's Request to Produce No. 8, BellSouth agrees to produce the requested documents.

9. In response to AT&T's Request to Produce No. 9, BellSouth does not have any information responsive to this request. As described in BellSouth's

Response to AT&T's First Set of Interrogatories: BellSouth was not involved in the process of developing or validating the national default inputs for the BCPM model.

10. In response to AT&T's Request to Produce No. 10, BellSouth does not have any information responsive to this request. As described in BellSouth's Response to AT&T's First Set of Interrogatories, BellSouth was not involved in the process of developing or validating the national default inputs for the BCPM model.

11. In response to AT&T's Request to Produce No. 11, BellSouth does not own any structure jointly with another entity, and therefore has no responsive documents regarding this aspect of the request. BellSouth does not consider trenching to be structure. However, BellSouth will make copies of joint use agreements and license agreements that relate to trenching available for review. These documents, however, are voluminous. The documents are also proprietary. Accordingly, BellSouth will make them available for viewing at a mutually agreeable time at the location at which they are retained in Atlanta, Georgia, after AT&T has executed an appropriate non-disclosure agreement.

12. In response to AT&T's Request to Produce No. 12, BellSouth agrees to produce the requested documents relating to copper cable pairs. There are no responsive documents relating to fiber strands.

13. In response to AT&T's Request to Produce No. 13, BellSouth states that the documents responsive to this request are confidential and

Respectfully submitted this 30th day of July, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (P)
ROBERT G. BEATTY
NANCY B. WHITE
c/o Nancy H. Sims
150 So. Monroe Street, Suite 400
Tallahassee, FL 32301
(305) 347-5555

William J. Ellenberg II (P)
WILLIAM J. ELLENBERG II
J. PHILLIP CARVER
675 West Peachtree Street, #4300
Atlanta, Georgia 30375
(404)335-0711

128527

**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 and Hand Delivery* this 30th day of July, 1998 to the following:

Jack Shreve, Esquire
Charles Beck, Esquire
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street, Rm. 812
Tallahassee, Florida 32399-1400
Tel. No. (850) 488-9330
Fax. No. (850) 488-4491

Fax. No. (404) 267-5992

Robert M. Post, Jr.
ITS
16001 S.W. Market Street
Indiantown, FL 34956
Tel. No. (561) 597-3113
Fax. No. (561) 597-2115

Michael Gross, Esquire
Assistant Attorney General
Office of the Attorney General
PL-0 1 The Capitol
Tallahassee, Florida 32399-1050
Tel. No. (850) 414-3300
Fax. No. (850) 488-6589

Charles Rehwinkel
Sprint-Florida, Inc.
1313 Blair Stone Road,
MC FLTHOO 107
Tallahassee, Florida 32301
Tel. No. (850) 847-0244
Fax. No. (850) 878-0777

Tracy Hatch, Esquire (+) *
AT&T
101 N. Monroe Street, Suite 700
Tallahassee, Florida 32301
Tel. No. (850) 425-6364
Fax. No. (850) 425-6361

Carolyn Marek
VP-Regulatory Affairs
S.E. Region
Time Warner Comm.
2828 Old Hickory Boulevard
Apt. 713
Nashville, TN 37221
Tel. No. (615) 673-1191
Fax. No. (615) 673-1192

Richard D. Melson, Esquire
Hopping, Green, Sams & Smith, P.A.
123 South Calhoun Street
Tallahassee, Florida 32314
Tel. No. (850) 425-2313
Fax. No. (850) 224-8551
Atty. for MCI

Norman H. Horton, Jr., Esquire
Messer, Caparello & Self P. A.
215 South Monroe Street
Suite 701
Tallahassee, Florida 32301
Tel. No. (850) 222-7720
Fax. No. (850) 224-4359
Represents e.spire™

Thomas K. Bond
MCI Metro Access Transmission
Services, Inc.
780 Johnson Ferry Road
Suite 700
Atlanta, GA 30342
Tel. No. (404) 267-6315

David B. Erwin, Esquire
Attorney-at-Law
127 Riversink Road
Crawfordville, Florida 32327

Tallahassee, FL 32399-0850
Tel. No. (850) 413-6204
Fax. No. (850) 413-6250

Steven Brown
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, Florida 33619-1309
Tel. No. (813) 829-0011
Fax. No. (813) 829-4923

Suzanne F. Summerlin, Esq.
1311-B Paul Russell Road
Suite 201
Tallahassee, FL 32301
Tel. No. (850) 656-2288
Fax. No. (850) 656-5589

Harriet Eudy
ALLTEL Florida, Inc.
206 White Avenue
Live Oak, Florida 32060
Tel. No. (904) 364-2517
Fax. No. (904) 364-2474

Lynne G. Brewer
Northeast Florida Telephone Co.
130 North 4th Street
Macclenny, Florida 32063
Tel. No. (904) 259-0639
Fax. No. (904) 259-7722

James C. Falvey, Esquire
e.spire™ Comm. Inc.
133 National Business Pkwy.
Suite 200
Annapolic Junction, MD 20701
Tel. No. (301) 361-4298
Fax. No. (301) 361-4277

Lynn B. Hall
Vista-United Telecomm.
3100 Bonnet Creek Road
Lake Buena Vista, FL 32830
Tel. No. (407) 827-2210
Fax. No. (407) 827-2424

William Cox
Staff Counsel
Florida Public Svc. Comm.
2540 Shumard Oak Blvd.

J. Phillip Carver
J. Phillip Carver (P)

(+) Protective Agreements