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RECORDS AND  
REPORTING

August 10, 1998

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

RE: Docket No. 980696-TP

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Objections to the Third Request for Production of Documents of Florida Cable Telecommunications Association. Please file these documents in the captioned docket.

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 on the parties shown on the attached Certificate of Service.

RECEIVED & FILED

Sincerely,

ACK 2  
AFA 2  
APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMU 1  
CTR \_\_\_\_\_  
EAG \_\_\_\_\_  
LEG 2  
LIN 5  
OPC \_\_\_\_\_  
RCH \_\_\_\_\_  
SEC 1  
WAS \_\_\_\_\_  
OTH \_\_\_\_\_

FPSC BUREAU OF RECORDS

Mary K. Keyer (cc)  
Mary K. Keyer

Enclosures

cc: All Parties of Record  
A. M. Lombardo  
R. G. Beatty  
W. J. Ellenberg (w/o enclosures)

DOCUMENT NUMBER-DATE

08489 AUG 10 98

FPSC-RECORDS/REPORTING

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 )  
\_\_\_\_\_ ) Dated: August 10, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'S**  
**OBJECTIONS TO THE THIRD REQUEST FOR PRODUCTION**  
**OF DOCUMENTS OF FLORIDA CABLE TELECOMMUNICATIONS**  
**ASSOCIATION**

BellSouth Telecommunications, Inc., ("BellSouth" or "Company"), hereby files, pursuant to Rule 25-22.034 and 25-22.035, Florida Administrative Code, and Rules 1.340 and 1.280(b), Florida Rules of Civil Procedure, the following objections to Florida Cable Telecommunications Association's Third Request for Production of Documents ("FCTA's 3rd PODs").

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 ("Commission")(Order No. PSC-98-0813-PCO-TP) in the above-captioned docket. 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 responses to the above-referenced request, BellSouth

reserves the right to supplement, revise, or modify its objections at the time that it serves its response. Moreover, should BellSouth determine that a Protective Order is necessary with respect to any of the requested material, BellSouth reserves the right to file a motion with the Commission seeking such an order at the time that it serves its response.

OBJECTION

BellSouth objects to FCTA's 3rd POD on the grounds that the information requested is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Respectfully submitted this 10th day of August, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

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ORIGINAL

**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 10th day of August, 1998 to the following:

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