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Legal Department

MARY K. KEYER
General Attorney

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BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0729

RECORDS AND
REPORTING

August 17, 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. 980733-TL

Dear Mrs. Bayo:

Enclosed are an original and 15 copies of BellSouth Telecommunications, Inc.'s Objections to Florida Legal Services, Inc.'s First Request for Production of Documents. 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.

Sincerely,

RECEIVED & FILED

Mary K. Keyer (ck)
Mary K. Keyer

FPSC-BUREAU OF RECORDS

Enclosures

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

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**CERTIFICATE OF SERVICE
Docket No. 980733-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Hand-Delivery this 17th day of August, 1998, to the following:

Benjamin Ochshorn
Florida Legal Services, Inc.
2121 Delta Boulevard
Tallahassee, FL 32303

Mary K. Keyer
Mary K. Keyer

DOCUMENT NUMBER-DATE

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available for inspection and copying "by Monday, August 17, 1998." Rule 25-22.034 of the Florida Administrative Code specifies that a party "may obtain discovery through the means and in the manner provided in Rules 1.280 through 1.400, Florida Rules of Civil Procedure." Rule 1.350 of the Florida Rules of Civil Procedure provides that written responses to requests for production of documents are due "within 30 days after service of the request." When a document to which a party must respond is served by U.S. Mail, five days are added to the time within which the served party must respond. Rule 25-22.028(4), Florida Administrative Code. Although the Florida Public Service Commission has ordered that objections be filed within 10 days of service of discovery, the Commission made no such exception with regard to the time within which a party has to respond to discovery. Therefore, in accordance with the Florida Administrative Code and the Florida Rules of Civil Procedure, BellSouth will provide responses to Florida Legal Service's First Request for Production of Documents by September 8, 1998.

Respectfully submitted this 17th day of August, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (ke)

ROBERT G. BEATTY

NANCY B. WHITE

c/o Nancy Sims

150 South Monroe Street, #400

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