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Legal Department

MARY K. KEYER
General Attorney

98 AUG 17 PH 4: 39

BellSouth Telecommunications, Inc.
150 South Monroe Street
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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 Cable Telecommunications Association'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,

Mary K. Keyer (re)

Mary K. Keyer

- ACK _____
- AFA /
- APP _____
- CAF _____
- CMU /
- CTR _____
- EAG _____
- LEG /
- LIN _____
- OPC _____
- RCH /
- SEC /
- WAS _____
- OTH _____

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FPSC-BUREAU OF RECORDS
Enclosures

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

DOCUMENT NUMBER-DATE

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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:

Laura L. Gallagher
Florida Cable Telecommunications
Association
310 N. Monroe Street
Tallahassee, Florida 32301

Mary K. Keyer (ke)
Mary K. Keyer

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Discovery for Study on Fair & Reasonable Rates and on Relationships Among Costs and Charges Associated with Certain Telecommunications Services Provided by LECs, as Required by Chapter 98-277.) Docket No.: 980733-TL
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_____) Filed: August 17, 1998

BELLSOUTH TELECOMMUNICATIONS, INC.'S
OBJECTIONS TO THE FIRST 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 ("FCTA") First Request for Production of Documents to BellSouth.

The objection stated herein is preliminary in nature and is made at this time for the purpose of complying with the ten-day requirement set forth in the procedural order issued by the Florida Public Service Commission ("Commission") in the above-captioned docket. Should additional grounds for objection be discovered as BellSouth prepares its responses to the above-referenced requests, BellSouth reserves the right to supplement, revise, or modify its objections at the time that it serves its responses.

OBJECTION

BellSouth objects to the response date specified by FCTA in its request. FCTA served its request by hand-delivery on August 5, 1998, and requested that the documents requested be made available for inspection and copying on or

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before August 25, 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." 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 FCTA's First Request for Production of Documents by September 4, 1998.

Respectfully submitted this 17th day of August, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (KR)

ROBERT G. BEATTY

NANCY B. WHITE

c/o Nancy Sims

150 South Monroe Street, #400

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William J. Ellenberg II (KR)

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