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Legal Department

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General Attorney

98 AUG 17 PM 4:39

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RECORDS AND
REPORTING

August 17, 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. 980696-TP

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Responses and Objections to TCG's First Request for Production of Documents, which we served today. Please file them 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.

Sincerely,

J. Phillip Carver (KR)

J. Phillip Carver

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

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

Enclosures

cc: All parties of record

A. M. Lombardo

R. G. Beatty

William J. Ellenberg II (w/o enclosures)

DOCUMENT NUMBER-DATE

08770 AUG 17 98

FPSC-RECORDS/REPORTING

**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 17th day of August, 1998 to the following:

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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 17, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES AND
OBJECTIONS TO TELEPORT COMMUNICATIONS GROUP INC./TCG
SOUTH FLORIDA'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 Teleport Communications Group Inc./TCG South Florida's ("TCG") First Request for Production of Documents dated July 24, 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 TCG's Request to Produce No. 1, this request is for information provided in response to Intermedia Communications, Inc.'s ("Intermedia") first document request, which BellSouth responded to on July 29, 1998. BellSouth hereby responds to this request by incorporating by reference its responses and objections to the above-noted request of Intermedia.

2. In response to TCG's Request to Produce No. 2, this request is for information provided in response to AT&T's first document request, which BellSouth responded to on July 30, 1998. BellSouth hereby responds to this request by incorporating by reference its responses and objections to the above-noted request of AT&T.

3. In response to TCG's Request to Produce No. 3, this request is for information provided in response to AT&T's second document request, which BellSouth responded to on August 5, 1998. BellSouth hereby responds to this request by incorporating by reference its responses and objections to the above-noted request of AT&T.

4. In response to TCG's Request to Produce No. 4, this request is for information provided in response to the Florida Cable Telecommunications Association's second document request, which BellSouth responded to on August 5, 1998. BellSouth hereby responds to this request by incorporating by reference its responses and objections to the above-noted request of the Florida Cable Telecommunications Association.

Respectfully submitted this 17th day of August, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (ke)

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