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RECORDS AND
REPORTING

ORIGINAL

August 25, 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 FCTA's Third 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
J. Phillip Carver (fw)

Enclosures

cc: All parties of record
A. M. Lombardo
R. G. Beatty
William J. Ellenberg II (w/o enclosures)

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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 384.025,)
Florida Statutes)
_____) Dated: August 25, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES AND
OBJECTIONS TO FCTA'S THIRD 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 Florida Cable Telecommunications Association's ("FCTA") Third Request for Production of Documents dated August 5, 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 FCTA's Request to Produce No. 6, this request is for information provided in response to AT&T's ("AT&T") Second Request for

DOCUMENT NUMBER-DATE

09230 AUG 25 88

FPSC-RECORDS/REPORTING

Production of Documents, 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.

Respectfully submitted this 25th day of August, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.



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**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 25th day of August, 1998 to the following:

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(+) Protective Agreements