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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 27, 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 AARP's 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.

RECEIVED & FILED

Sincerely,

FPSC-BUREAU OF RECORDS

*Mary K. Keyer*  
(ps)

Mary K. Keyer

Enclosures

- ACK ✓
- AFA 3
- APP
- CAF
- CMU Alash
- CTR
- EAG
- LEG 2
- LIN
- OPC
- RCH 2
- SEC 1
- WAS
- OTH

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

DOCUMENT NUMBER-DATE

00869 AUG 27 98

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  
 )  
 )  
 ) Filed: August 27, 1998  
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**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
 OBJECTIONS TO AARP'S REQUEST FOR  
PRODUCTION OF DOCUMENTS**

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 the request for production of documents to BellSouth of the American Association of Retired Persons ("AARP").

The objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the 10-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 it serves its responses. 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 it serves its responses.

## GENERAL OBJECTIONS

BellSouth makes the following General Objections to AARP's Request for Production of Documents which will be incorporated by reference into BellSouth's specific responses when its responses are served on AARP.

1. BellSouth objects to the requests to the extent that such requests seek to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such requests are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. BellSouth has interpreted the discovery requests in this docket to apply to BellSouth's regulated intrastate operations in Florida and will limit its responses accordingly. To the extent that any request is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission, BellSouth objects to such request to produce as irrelevant, overly broad, unduly burdensome, and oppressive.

3. BellSouth objects to each and every request and instruction to the extent that such request or instruction calls for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. BellSouth objects to each and every request insofar as the request is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these requests. Any responses provided by BellSouth in response to the

AARP's request will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth objects to each and every request insofar as the request is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. BellSouth will attempt to note each instance where this objection applies.

6. BellSouth objects to AARP's discovery requests, instructions and definitions, insofar as they seek to impose obligations on BellSouth that exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

7. BellSouth objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

8. BellSouth objects to each and every request, insofar as it is unduly burdensome, expensive, oppressive, or excessively time-consuming as written.

9. BellSouth objects to each and every request to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent AARP requests proprietary confidential business information which is not subject to the "trade secrets" privilege, BellSouth will make such information available to counsel for AARP subject to a Protective Agreement in which AARP agrees to treat the information as confidential and any other general or specific objections contained herein.

10. BellSouth is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business,

BellSouth creates countless documents that are not subject to Florida Public Service Commission or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been provided in response to these discovery requests. Rather, these responses provide all of the information obtained by BellSouth after a reasonable and diligent search conducted in connection with this discovery request. BellSouth conducted a search of those files that are reasonably expected to contain the requested information. To the extent that the discovery request purports to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

11. 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 where the documents are located.

#### **SPECIFIC OBJECTIONS**

1. BellSouth incorporates by reference its objections made to Florida Legal Services' First Request for Production of Documents, FCTA's First Request for Production of Documents, Public Service Commission's First Request for Production of Documents, Citizens'/Attorney General's First and Second Requests for Production of Documents, and Citizens' Third Request for Production of Documents, as if they were set forth fully herein.



2. BellSouth objects to providing the documents requested in Requests 7, 10 and 11 under General Objections 3, 4, 5, 6, 7 and 8.

Respectfully submitted this 27th day of August, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Robert G. Beatty* (PW)

ROBERT G. BEATTY  
NANCY B. WHITE  
c/o Nancy Sims  
150 South Monroe Street, #400  
Tallahassee, Florida 32301  
(305)347-5555

*William J. Ellenberg II* (PW)

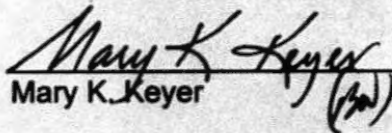
WILLIAM J. ELLENBERG II  
MARY K. KEYER  
675 West Peachtree Street, #4300  
Atlanta, Georgia 30375  
(404)335-0711

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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 27th day of August, 1998, to the following:

David M. Frank  
Law Office of David M. Frank  
1403 Maclay Commerce Drive  
Suite 3  
Tallahassee, FL 32312

  
Mary K. Keyer

STAR DEPT  
24 OCTOBER