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58 AUG 28 PM 4:46

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RECORDS AND
REPORTING

August 28, 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. 980696-TP

Dear Mrs. Bayo:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Objections to Staff's Second Set of Interrogatories and Second 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,

J. Phillip Carver (cc)

J. Phillip Carver

Enclosures

- ACK
- AFA 3
- APP _____
- CAF _____
- CMU King
- CTR _____
- EAG _____
- LEG 2
- LIN 5
- QPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

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

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DOCUMENT NUMBER-DATE

09422 AUG 28 88

FPSC-RECORDS/REPORTING

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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 28, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
OBJECTIONS TO STAFF'S SECOND SET OF INTERROGATORIES
AND SECOND 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, hereby submits the following Objections to the Staff of the Florida Public Service Commission's ("Staff") Second Set of Interrogatories and Second Request for Production of Documents.

The objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the five-day requirement set forth in the procedural order issued by the Florida Public Service Commission ("Commission") in the above-referenced dockets. Should additional grounds for objection be discovered as BellSouth prepares its Answers to the above-referenced set of requests, BellSouth reserves the right to supplement, revise, or modify its objections at the time that it serves its Answers on Staff. Moreover, should BellSouth determine that a Protective Order is necessary with respect to any of the material requested by Staff, BellSouth reserves the right to file a motion with the Commission seeking such an order at the time that it serves its Answers on Staff.

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

GENERAL OBJECTIONS

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

1. BellSouth objects to the interrogatories 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 Staff's interrogatories to apply to BellSouth's regulated intrastate operations in Florida and will limit its Answers accordingly. To the extent that any interrogatory is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission, BellSouth objects to such interrogatory to produce as irrelevant, overly broad, unduly burdensome, and oppressive.

3. BellSouth objects to each and every interrogatory and instruction to the extent that such interrogatory 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 interrogatory insofar as the interrogatory 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 interrogatories. Any Answers provided by BellSouth in response to Staff's interrogatory will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth objects to each and every interrogatory insofar as the interrogatory 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 Staff's discovery, 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 interrogatory, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. BellSouth objects to each and every interrogatory to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506,

Florida Statutes. To the extent that Staff requests proprietary confidential business information which is not subject to the "trade secrets" privilege, BellSouth will make such information available to counsel for Staff pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

Respectfully submitted this 28th day of August, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

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131973

**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 28th day of August, 1998 to the following:

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(+) Protective Agreements