

## 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 31, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES  
AND OBJECTIONS TO AT&T'S FOURTH 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 AT&T Communications of the Southern States, Inc.'s ("AT&T") Fourth Request for Production of Documents dated August 11, 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 AT&T's Request to Produce No. 29, BellSouth agrees to produce the requested documents at a mutually agreeable time and

DOCUMENT NUMBER-DATE

09518 AUG 31 88

FPSC-RECORDS/REPORTING

place. BellSouth also notes that the "documents" response to 29(c) are retained electronically as part of a voluminous database. Accordingly, BellSouth will produce a document that lists in paper form the pertinent information extracted from that database.

2. In response to AT&T's Request to Produce No. 30, BellSouth states that all responsive documents have been filed in this docket and/or docket 980000A-SP, as described more fully in response to Interrogatory No. 47.

Respectfully submitted this 31st day of August, 1998.

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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 31st day of August, 1998 to the following:

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