

ORIGINAL

Legal Department

J. PHILLIP CARVER
General Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0710

August 31, 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 Citizens' 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

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

Enclosures

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
W. J. Ellenberg

RECEIVED & FILED

[Signature]
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

09519 AUG 31 88

FPSC-RECORDS/REPORTING

ORIGINAL

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
OBJECTIONS TO CITIZENS' 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 Citizens' Second Request for Production of Documents ("Public Counsel").

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 Public Counsel. Moreover, should BellSouth determine that a Protective Order is necessary with respect to any of the material requested by Public Counsel, BellSouth reserves the right to file a motion with the Commission seeking such an order at the time that it serves its Answers on Public Counsel.

DOCUMENT NUMBER-DATE

09519 AUG 31 88

FPC-RECORDS/REPORTING

utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these requests. Any Answers provided by BellSouth in response to Public Counsel'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 Public Counsel'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 that Public Counsel's requests proprietary confidential business information which is not

subject to the "trade secrets" privilege, BellSouth will make such information available to counsel for Public Counsel pursuant to an appropriate Protective Agreement, subject to 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. Public Counsel requests herein documents that have previously been produced to other parties in response to previous discovery. Without limiting any of the foregoing objections,

BellSouth incorporates herein by reference its objections to that previous discovery.

Respectfully submitted this 31st day of August, 1958.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (KR)

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 (KR)

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

132258

Fax. No. (813) 204-8870

Norman H. Horton, Jr., Esquire
Messer, Caparello & Self P. A.
215 South Monroe Street
Suite 701
Tallahassee, Florida 32301
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Represents e.spire™

David B. Erwin, Esquire
Attorney-at-Law
127 Riversink Road
Crawfordville, Florida 32327
Tel. No. (850) 926-9331
Fax. No. (850) 926-8448
Represents GTC, Frontier,
ITS and TDS

Floyd R. Self, Esquire
Messer, Caparello & Self, P.A.
215 South Monroe Street
Suite 701
Tallahassee, FL 32301
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Represents WorldCom

Patrick Wiggins, Esquire
Donna L. Canzano, Esquire (+)
Wiggins & Villacorta
2145 Delta Blvd.
Suite 200
Tallahassee, Florida 32302
Tel. No. (850) 385-6007
Fax. No. (850) 385-6008

Kimberly Caswell, Esquire
GTE Florida Incorporated
201 North Franklin Street
16th Floor
Tampa, Florida 33602
Tel. No. (813) 483-2617

Jeffry J. Wahlen, Esquire
Ausley & McMullen
227 South Calhoun Street
Tallahassee, Florida 32301
Tel. No. (850) 425-5471 or 5487
Fax. No. (850) 222-7560
Represents ALLTEL, NEFTC,
and Vista-United

Tom McCabe
TDS Telecom
107 West Franklin Street
Quincy, FL 32351
Tel. No. (850) 875-5207
Fax. No. (850) 875-5225

Peter M. Dunbar, Esquire
Barbara D. Auger, Esquire
Pennington, Moore, Wilkinson,
& Dunbar, P. A.
215 South Monroe Street
2nd Floor
Tallahassee, Florida 32301
Tel. No. (850) 222-3533
Fax. No. (850) 222-2126

Brian Sulmonetti
WorldCom, Inc.
1515 South Federal Highway
Suite 400
Boca Raton, FL 33432
Tel. No. (561) 750-2940
Fax. No. (561) 750-2629

Kelly Goodnight
Frontier Communications
180 South Clinton Avenue
Rochester, New York 14646
Tel. No. (716) 777-7793
Fax. No. (716) 325-1355

Suite 200
Annapolis Junction, MD 20701
Tel. No. (301) 361-4298
Fax. No. (301) 361-4277

Laura Gallagher (+)
VP-Regulatory Affairs
Florida Cable Telecommunications
Association, Inc.
310 N. Monroe Street
Tallahassee, Florida 32301
Tel. No. (850) 681-1990
Fax. No. (850) 681-9676

Mark Ellmer
GTC Inc.
502 Fifth Street
Port St. Joe, Florida 32456
Tel. No. (850) 229-7235
Fax. No. (850) 229-8689

Steven Brown
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, Florida 33619-1309
Tel. No. (813) 829-0011
Fax. No. (813) 829-4923

Harriet Eudy
ALLTEL Florida, Inc.
206 White Avenue
Live Oak, Florida 32060
Tel. No. (904) 364-2517
Fax. No. (904) 364-2474

Lynne G. Brewer
Northeast Florida Telephone Co.
130 North 4th Street
Macclenny, Florida 32063
Tel. No. (904) 259-0639
Fax. No. (904) 259-7722

James C. Falvey, Esquire
e.spire™ Comm. Inc.
133 National Business Pkwy.

Lynn B. Hall
Vista-United Telecomm.
3100 Bonnet Creek Road
Lake Buena Vista, FL 32830
Tel. No. (407) 827-2210
Fax. No. (407) 827-2424

William Cox
Staff Counsel
Florida Public Svc. Comm.
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6204
Fax. No. (850) 413-6250

Suzanne F. Summerlin, Esq.
1311-B Paul Russell Road
Suite 201
Tallahassee, FL 32301
Tel. No. (850) 656-2288
Fax. No. (850) 656-5589

Kenneth A. Hoffman, Esq. (+)
John R. Ellis, Esq.
Rutledge, Ecenia, Underwood,
Purnell & Hoffman, P.A.
215 South Monroe Street
Suite 420
Tallahassee, FL 32301-1841
Tel. No. (850) 681-6788
Fax. No. (850) 681-6515

Paul Kouroupar
Michael McRae, Esq.
Teleport Comm. Group, Inc.
2 Lafayette Centre
1133 Twenty-First Street, N.W.
Suite 400
Washington, D.C. 20036