

ORIGINAL

REC'D - ED-EPSC

Legal Department

J. PHILLIP CARVER
General Attorney

98 SEP -1 PM 4:36

BellSouth Telecommunications, Inc.
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RECORDS AND
REPORTING

September 1, 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 Fourth 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.

RECEIVED & FILED

Sincerely,



J. Phillip Carver

J. Phillip Carver
(fw)

J. Phillip Carver

FPSC BUREAU OF RECORDS

Enclosures

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

- ACK
- AFA 2
- APP _____
- CAF _____
- CML Finney
- CTR _____
- EAG _____
- LEG 2
- LIN 5
- QPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

DOCUMENT NUMBER-DATE

9560-SEP-1 88

RECORDS AND 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: September 1, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES AND
OBJECTIONS TO FCTA'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 Florida Cable Telecommunications Association's ("FCTA") Fourth Request for Production of Documents dated August 12, 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. 7, this request is for information provided in response to AT&T's ("AT&T") Third Request for

DOCUMENT NUMBER-DATE

09560 SEP-1 1998

NO RECORD REPORTING

**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 1st day of September, 1998 to the following:

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J. Phillip Carver (for)

(+) Protective Agreements