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Legal Department

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NANCY B. WHITE
Assistant General Counsel-Florida

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BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5558

RECORDS AND
REPORTING

September 3, 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. 980800-TP (Supra - Interconnection & Collocation)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Responses and Objections to Supra Telecommunications and Information Systems, Inc.'s First Request for Production of Documents and Motion for Temporary Protective Order, which we ask that you file 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 to the parties shown on the attached Certificate of Service.

RECEIVED & FILED
[Signature]
FPSC-BUREAU OF RECORDS

Sincerely,
Nancy B. White
Nancy B. White (Pw)

- ACK
- AFA
- APP
- CAE
- CMU
- CTR
- EAG
- LEG 1
- LIN 3
- OPC
- RCH
- SEC 1
- WAS
- OTH

cc: All parties of record
A. M. Lombardo
B. G. Beatty
William J. Ellenberg II

DOCUMENT NUMBER-DATE
09674 SEP-4 88
RECORDS AND REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Emergency Relief of Supra) Docket No. 980800-TP
Telecommunications and Information)
Systems, Inc., Against BellSouth)
Telecommunications, Inc.)
_____) Filed: September 3, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES AND
OBJECTIONS TO SUPRA TELECOMMUNICATIONS
AND INFORMATION SYSTEMS, INC.'S FIRST
REQUEST FOR PRODUCTION OF DOCUMENTS AND
MOTION FOR TEMPORARY PROTECTIVE ORDER**

BellSouth Telecommunications, Inc., ("BellSouth" or "Company"), pursuant to Rules 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 Responses, Objections and Motion for Temporary Protective Order to Supra Telecommunications and Information Systems, Inc.'s ("Supra") First Request for Production of Documents.

GENERAL RESPONSES

BellSouth makes the following General Objections to Supra's First Request for Production of Documents:

1. BellSouth has interpreted Supra's requests 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.

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FILED-RECORDS-INT-REGISTRATION

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

3. 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.

MOTION FOR TEMPORARY PROTECTIVE ORDER

4. 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 Supra requests proprietary confidential business information which is not subject to the "trade secrets" privilege, BellSouth will make such information available to counsel for Supra

pursuant to an appropriate Protective Agreement and subject to any other general or specific objections contained herein.

SPECIFIC RESPONSES

5. With respect to Request No. 1, BellSouth objects to the extent BellSouth objects to a specific interrogatory. To the extent BellSouth does not object to a specific interrogatory, BellSouth will produce responsive documents that are in its possession, custody or control at a mutually convenient time and place subject to the Motion for Temporary Order set forth above and subject to Supra entering into a Protective Agreement with BellSouth.

6. With respect to Request No. 2, BellSouth objects to this request on the grounds that the request is overly broad, unduly burdensome, and oppressive. In addition, the request is vague and ambiguous. Moreover, BellSouth objects on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence. With respect to the two central offices that are the subject of this action, BellSouth has provided Supra with the requested information.

7. With respect to Request No. 3, BellSouth objects to this request on the grounds that the request is overly broad, unduly burdensome, and oppressive. In addition, the request is vague and ambiguous. Moreover, BellSouth objects on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence. With respect to the two central

offices that are the subject of this action, BellSouth has provided Supra with the requested information.

8. With respect to Request No. 4, BellSouth objects to this request on the grounds that the request is overly broad, unduly burdensome, and oppressive. In addition, the request is vague and ambiguous. Moreover, BellSouth objects on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence. With respect to the two central offices that are the subject of this action, BellSouth has provided Supra with the requested information.

9. With respect to Request No. 5, BellSouth has produced the responsive documents it has in its possession, custody or control in response to Request No. 6.

10. With respect to Request No. 6, BellSouth objects to this request on the grounds that the request is overly broad, unduly burdensome, and oppressive. In addition, the request is vague and ambiguous. Moreover, BellSouth objects on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence. With respect to the two central offices that are the subject of this action, BellSouth will produce responsive documents that are in its possession, custody or control at a mutually convenient time and place subject to the Motion for Temporary Order set forth above and subject to Supra entering into a Protective Agreement with BellSouth.

11. With respect to Request No. 7, BellSouth objects to this request on the grounds that the request is not a request for documents and is unclear, vague and ambiguous. Moreover, BellSouth objects on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving this objection, BellSouth refers Supra to the documents produced in response to Request No. 6.

12. With respect to Request No. 8, BellSouth objects to this request on the grounds that the request is overly broad, unduly burdensome, and oppressive. In addition, the request is vague and ambiguous. Moreover, BellSouth objects on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence. With respect to the two central offices that are the subject of this action, BellSouth will produce responsive documents that are in its possession, custody or control at a mutually convenient time and place subject to the Motion for Temporary Order set forth above and subject to Supra entering into a Protective Agreement with BellSouth.

13. With respect to Request No. 9, BellSouth objects to this request on the grounds that the request is overly broad, unduly burdensome, and oppressive. In addition, the request is vague and ambiguous. Moreover, BellSouth objects on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence. With respect to the two central offices that are the subject of this action, BellSouth will produce responsive documents that are in its possession, custody or control at a mutually convenient

time and place subject to the Motion for Temporary Order set forth above and subject to Supra entering into a Protective Agreement with BellSouth. See also BellSouth's response to Request No. 6.

14. With respect to Request No. 10, BellSouth objects to this request on the grounds that the request is overly broad, unduly burdensome, and oppressive. In addition, the request is vague and ambiguous. Moreover, BellSouth objects on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence. With respect to the two central offices that are the subject of this action, see BellSouth's response to Request No. 1.

15. With respect to Request No. 11, BellSouth objects to this request on the grounds that the request is overly broad, unduly burdensome, and oppressive. In addition, the request is vague and ambiguous. Moreover, BellSouth objects on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence. With respect to the two central offices that are the subject of this action, BellSouth has no responsive documents in its possession, custody and control.

16. With respect to Request No. 12, BellSouth objects to this request on the grounds that the request is overly broad, unduly burdensome, and oppressive. In addition, the request is vague and ambiguous. Moreover, BellSouth objects on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence. With respect to the two central

offices that are the subject of this action, BellSouth has provided Supra with the requested information.

17. With respect to Request No. 13, BellSouth objects to this request on the grounds that the request is overly broad, unduly burdensome, and oppressive. In addition, the request is vague and ambiguous. Moreover, BellSouth objects on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence.

18. With respect to Request No. 14, BellSouth objects because the information requested is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Furthermore, no documents have been requested. To the extent Supra seeks details of each virtual collocation in existence in Florida, this information is considered customer proprietary information by BellSouth and protected by Section 364.24(2), Florida Statutes. In further response to this request, BellSouth refers Supra to BellSouth's answer to Interrogatory 6.

19. With respect to Request No. 15, BellSouth objects to the extent that the physical collocation agreements to which BellSouth is a party are on public record with the Florida Public Service Commission. To the extent that Supra seeks details of each physical collocation in existence in Florida, this information is considered customer proprietary information by BellSouth and protected by Section 364.24(2), Florida Statutes. Moreover, such information is not relevant to the issues in this proceeding.

20. With respect to Request No. 16, see BellSouth's responses to Request Nos. 14 and 15. To the extent that Supra seeks details of each virtual and physical collocation in the state of Florida, this information is considered customer proprietary information by BellSouth and protected by Section 364.24(2), Florida Statutes. Moreover, such information is not relevant to the issues in this proceeding. With respect to the equipment that is permitted to be placed in physical collocation scenarios, see BellSouth's answer to Interrogatory No. 26.

21. With respect to Request No. 17, BellSouth will produce responsive documents that are in its possession, custody or control at a mutually convenient time and place subject to the Motion for Temporary Order set forth above and subject to Supra entering into a Protective Agreement with BellSouth.

22. With respect to Request No. 18, BellSouth has no responsive documents in its possession, custody or control. In further response to this request, BellSouth refers Supra to BellSouth's answers to Interrogatory Nos. 14, 15, 16, and 17.

23. With respect to Request No. 19, BellSouth has no documents responsive to this request.

24. With respect to Request No. 20, BellSouth objects to this request on the grounds that the request is overly broad, unduly burdensome, and oppressive. In addition, the request is vague and ambiguous. Moreover,


BellSouth objects on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence.

25. With respect to Request No. 21, BellSouth objects to this request on the grounds that the request is overly broad, unduly burdensome, and oppressive. In addition, the request is vague and ambiguous. Moreover, BellSouth objects on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence.


26. With respect to Request No. 22, BellSouth objects to this request on the grounds that the request is overly broad, unduly burdensome, and oppressive. In addition, the request is vague and ambiguous. Moreover, BellSouth objects on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence.

Respectfully submitted this 3rd day of September, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.



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

CERTIFICATE OF SERVICE
Docket No. 980800-TP

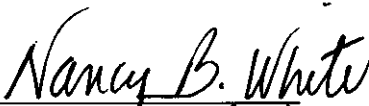
I HEREBY CERTIFY that a true and correct copy of the foregoing was served by
*Hand Delivery and Federal Express this 3rd day of September, 1998 to the following:

Beth Keating, Esq.
Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
(850) 413-6199

Suzanne Fannon Summerlin, Esq. •
Supra Telecommunications and
Information Systems, Inc.
1311-B Paul Russell Rd., #201
Tallahassee, Florida 32301
Tel. No. (850) 656-2288
Fax. No. (850) 656-5589

Supra Telecommunications and
Information Systems, Inc.
2620 S.W. 27th Avenue
Miami, FL 33133
Tel. No. (305) 476-4220
Fax. No. (305) 476-4282

Amanda Grant
BellSouth Telecommunications, Inc.
Regulatory & External Affairs
675 West Peachtree Street, N.E.
Room 38L64
Atlanta, Georgia 30375


Nancy B. White (BW)