

ORIGINAL

RECEIVED-FPSC

Legal Department

MARY K. KEYER
General Attorney

98 SEP -8 PM 4: 30

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0729

RECORDS AND
REPORTING

September 8, 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. 980733-TL

Dear Mrs. Bayo:

Enclosed are an original and 15 copies of BellSouth Telecommunications, Inc.'s, Responses and Objections to the Staff's First 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,

Mary K. Keyer
Mary K. Keyer

RECEIVED & FILED

[Signature]
FPSC/BUREAU OF RECORDS

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

Enclosures

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

DOCUMENT NUMBER-DATE

09787 SEP-88

FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Discovery for Study on Fair & Reasonable Rates and on Relationships Among Costs and Charges Associated with Certain Telecommunications Services Provided by LECs, as Required by Chapter 98-277.)

Docket No.: 980733-TL

Filed: September 8, 1998

BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES AND OBJECTIONS TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

BellSouth Telecommunications, Inc. ("BellSouth"), files pursuant to Rule 25-22.034, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, its Responses and Objections to the Staff of the Florida Public Service Commission's ("Staff") First Request for Production of Documents dated August 3, 1998.

GENERAL OBJECTIONS

1. BellSouth incorporates by reference its objections made to Staff's First Request for Production of Documents as if they were set forth fully herein.
2. BellSouth incorporates by reference its objections made to the First Set of Requests for Production of Documents served in this docket on BellSouth by the Attorney General and Citizens of Florida as if they were set forth fully herein.
3. BellSouth incorporates by reference its objections made to the Third Set of Requests for Production of Documents served in this docket on

DOCUMENT NUMBER-DATE

U9787 SEP-8

REGISTRATION REPORTING

BellSouth by the Attorney General and Citizens of Florida as if they were set forth fully herein.

GENERAL RESPONSES

1. With regard to Staff's definition of "documents", BellSouth has made a diligent, good faith attempt to locate documents responsive to the scope of Staff's individual requests for documents.

2. BellSouth does not believe it was Staff's intent to require BellSouth to produce again the same documents previously produced in other dockets, but to the extent it does, BellSouth objects on the basis that such a request would be unduly burdensome, oppressive, and unnecessary, and for these reasons is prohibited.

3. BellSouth objects to the specific time and place designated by Staff for the production of documents for the reasons that the designation is not reasonable, but has no objection to producing the documents that are responsive and to which no other objection is made, at a mutually agreed upon time and place.

4. The following Specific Responses are given subject to the above-stated General Objections and Responses.

SPECIFIC RESPONSES

1. Please provide all responses to the First Set of Interrogatories served in this Docket on BellSouth Telecommunications, Inc. by the Attorney General and the Citizens of Florida.

Response: BellSouth will produce copies of its answers to Citizens' First Set of Interrogatories and to the Attorney General's First Set of Interrogatories, subject to BellSouth's Notice of Intent filed September 8, 1998.

2. Please provide all documents requested in the First Set of Requests for Production of Documents served in this Docket on BellSouth Telecommunications, Inc. by the Attorney General and the Citizens of Florida.

Response: The information contained in some of the documents requested constitutes confidential proprietary business information, which BellSouth will produce subject to BellSouth's Notice of Intent filed September 8, 1998.

3. Please provide all documents requested in the Third Set of Requests for Production of Documents served in this Docket on BellSouth Telecommunications, Inc. by the Attorney General and the Citizens of Florida.

Response: To the extent BellSouth has not already produced the requested documents to Staff, BellSouth will produce the documents requested, some of which contain confidential proprietary business information, subject to BellSouth's Notice of Intent filed September 8, 1998.

Respectfully submitted this 8th day of September, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B White mkk

ROBERT G. BEATTY
NANCY B. WHITE
c/o Nancy H. Sims
150 So. Monroe Street, Suite 400
Tallahassee, FL 32301
(305) 347-5555

Mary Keyer

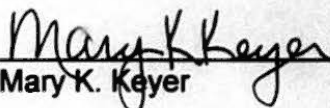
WILLIAM J. ELLENBERG II
MARY K. KEYER
Suite 4300
675 W. Peachtree St., NE
Atlanta, GA 30375
(404) 335-0711

131294

CERTIFICATE OF SERVICE
Docket No. 980733-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Hand-Delivery this 8th day of September, 1998, to the following:

Beth Keating
Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850



Mary K. Keyer