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Legal Department

J. PHILLIP CARVER  
General Attorney

00 SEP 17 PM 4:52

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

RECORDS AND  
REPORTING

September 17, 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 Staff's Third 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.

Sincerely,

*J. Phillip Carver*  
J. Phillip Carver (JPC)

- ACK
- AFA   2
- APP
- CAF
- CM King
- CTR
- EAG
- LEG   2
- LIN   5
- OPC
- RCH
- SEC   1
- NAS
- OTH

RECEIVED & FILED

*JPC*

FPSC-BUREAU OF RECORDS

Enclosures

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

DOCUMENT NUMBER-DATE

10258 SEP 17 98

FPSC-RECORDS/REPORTING

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 17, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES AND  
OBJECTIONS TO STAFF'S THIRD 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 the Staff of the Florida Public Service Commission's ("Staff") Third Request for Production of Documents dated August 28, 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 Staff's Request to produce No. 15, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

The responsive documents are proprietary. Accordingly, BellSouth is filing a Notice of Intent to request confidential classification on this day.

2. In response to Staff's Request to Produce No. 16, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

3. In response to Staff's Request to Produce No. 17, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

4. In response to Staff's Request to Produce No. 18, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

5. In response to Staff's Request to Produce No. 19, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

6. In response to Staff's Request to Produce No. 20, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

7. In response to Staff's Request to Produce No. 21, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

8. In response to Staff's Request to Produce No. 22, BellSouth agrees to produce the requested documents at a mutually agreeable time and

place. The responsive documents are proprietary. Accordingly, BellSouth is filing a Notice of Intent to request confidential classification on this day.

9. In response to Staff's Request to Produce No. 23, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

10. In response to Staff's Request to Produce No. 24, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

11. In response to Staff's Request to Produce No. 25, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

12. In response to Staff's Request to Produce No. 26, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

13. In response to Staff's Request to Produce No. 27, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

14. In response to Staff's Request to Produce No. 28, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

15. In response to Staff's Request to Produce No. 29, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

16. In response to Staff's Request to Produce No. 30, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

17. In response to Staff's Request to Produce No. 31, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

18. In response to Staff's Request to Produce No. 32, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

19. In response to Staff's Request to Produce No. 33, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

20. In response to Staff's Request to Produce No. 34, BellSouth states that it has no responsive documents in its possession, control or custody. The information contained in Table 2, referenced in the Request to Produce, was taken from the 1994 TIGER data files.

21. In response to Staff's Request to Produce No. 35, BellSouth states that it has no responsive documents in its possession, control or custody.

22. In response to Staff's Request to Produce No. 36, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

23. In response to Staff's Request to Produce No. 37, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

24. In response to Staff's Request to Produce No. 38, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

25. In response to Staff's Request to Produce No. 39, BellSouth states that it has no responsive documents in its possession, control or custody.

26. In response to Staff's Request to Produce Nos. 40 and 41, BellSouth has certain materials that it has provided to bond rating agencies, including Standard & Poor's and Moody's, on its own behalf, but it does not have possession, custody or control of any such documents that might have been prepared by BellSouth Corporation or any of its other subsidiaries. Moreover, BellSouth objects to producing this information as to BellSouth Corporation because this information does not relate to the cost models at issue in this docket or inputs to those models. Specifically, BellSouth's cost of capital inputs, and the testimony supporting those inputs, are for BellSouth Telecommunications, not BellSouth Corporation.

The materials BellSouth has that may be responsive to the Staff's requests (and which relate to BellSouth Telecommunications) constitute confidential proprietary business information, some of which is so sensitive that any individual who reviews the information is deemed to be an "insider" for purposes of the Securities and Exchange Commission rules.

With this in mind, and assuming that those members of the Staff who wish to review this material are willing to review the materials with the understanding that doing so may make them "insiders" for purposes of the Securities and Exchange Commission, BellSouth will produce the requested materials that are in its possession, custody and control at a mutually agreed upon time and place, subject to the material being treated as proprietary confidential business information. BellSouth will file Notices and Requests for Confidential Classification at the appropriate time.

27. In response to Staff's Request to Produce No. 42, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

28. In response to Staff's Request to Produce No. 43, BellSouth states that it has no responsive documents in its possession, control or custody.

29. In response to Staff's Request to Produce No. 44, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

30. In response to Staff's Request to Produce No. 45, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

31. In response to Staff's Request to Produce No. 46, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

32. In response to Staff's Request to Produce No. 47, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

33. In response to Staff's Request to Produce No. 48, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

34. In response to Staff's Request to Produce No. 49, BellSouth agrees to produce the requested documents at a mutually agreeable time and place. The responsive documents are proprietary. Accordingly, BellSouth is filing a Notice of Intent to request confidential classification on this day

35. In response to Staff's Request to Produce No. 50, BellSouth objects to producing this information as to BellSouth Corporation because this information does not relate to the cost models at issue in this docket or inputs to those models. Specifically, BellSouth's cost of capital inputs, and the testimony supporting those inputs, are for BellSouth Telecommunications, not BellSouth Corporation.

36. In response to Staff's Request to Produce No. 51, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

Respectfully submitted this 17th day of September, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Robert G. Beatty*

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134273

ORIGINAL

**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 17th day of September, 1998 to the following:

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DOCUMENT NUMBER-DATE

10258 SEP 17 88

FPSC-RECORDS/REPORTING

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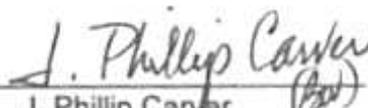
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\_\_\_\_\_  
J. Phillip Carver

(+) Protective Agreements