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Legal Department

NANCY B. WHITE
Assistant General Counsel-Florida

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BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
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RECORDS AND
REPORTING

September 23, 1998

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

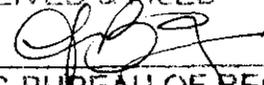
Re: Docket No. 980800-TP (Supra Collocation)

Dear Ms. Bayó:

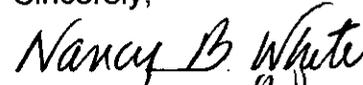
Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Objections to Supra Telecommunications and Information Systems, Inc.'s Second Set of Interrogatories and Second Request for Production of Documents, which we ask that you file in the captioned docket.

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


FPSC-BUREAU OF RECORDS

Sincerely,


Nancy B. White 

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NBW/vf

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

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

ORIGINAL

CERTIFICATE OF SERVICE
Docket No. 980800-TP

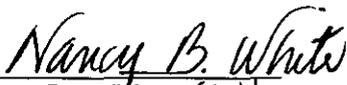
I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express this 23rd day of September, 1998 to the following:

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

Suzanne Fannon Summerlin, Esq.
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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 (b/w)

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 23, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'s OBJECTIONS
TO SUPRA TELECOMMUNICATIONS AND INFORMATION
SYSTEMS, INC.'S SECOND SET OF INTERROGATORIES AND
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS**

BellSouth Telecommunications, Inc. ("BellSouth"), 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 Supra Telecommunications and Information Systems, Inc.'s ("Supra") Second Set of Interrogatories and Second Request for Production of Documents.

The objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the ten-day requirement set forth in the procedural order (Order No. PSC-98-1219-PCO-TP) issued by the Florida Public Service Commission ("Commission") on September 16, 1998 in the above-referenced docket. 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 Supra. Moreover, should BellSouth determine that a Protective Order is necessary with respect to any of the material requested by Supra, BellSouth reserves the right to file a motion with the Commission seeking such an order at the time that it serves its Answers on Supra.

BellSouth makes the following General Objections to Supra's Second Request for Production of Documents and Second Set of Interrogatories which will be incorporated by reference into BellSouth's specific responses when its Answers are served on Supra.

1. BellSouth objects to the requests to the extent that such requests seek to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such requests are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. BellSouth has interpreted Supra's requests to apply to BellSouth's regulated intrastate operations in Florida and will limit its Answers 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.

3. BellSouth objects to each and every request and instruction to the extent that such request or instruction calls for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. BellSouth objects to each and every request insofar as the request is vague, ambiguous, overly broad, imprecise, or 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 Supra'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 Supra's discovery requests, instructions and definition, 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 producing any information or documents that are not in its possession, custody or control.

9. BellSouth objects to producing any information or documents that it (or third parties having possession of the information) is contractually, or otherwise legally, bound not to release.

10. BellSouth objects to each and every request, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

11. 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, subject to any other general or specific objections contained herein.

12. 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 the 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. BellSouth will conduct a search of the 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.

Respectfully submitted this 23rd day of September, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.



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