

ORIGINAL

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Legal Department

NANCY B. WHITE
Assistant General Counsel-Florida

99 SEP 25 FH 4:43

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

RECORDS AND
REPORTING

September 25, 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. 980947-TL
Waiver for Boca Raton/Boca Teeca Central Office**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunication's Inc.'s Response to Staff's First Request for Production of Documents, which we ask that you file 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,
Nancy B. White
Nancy B. White *(Bw)*

- ACK
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- EG
- JN _____
- OPC _____
- RCH _____
- REC
- VAS _____
- OTH _____

RECEIVED & FILED
CBS
FPSC-BUREAU OF RECORDS

Enclosures

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

DOCUMENT NUMBER-DATE
10653 SEP 25 98
FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 980947-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

*Hand-Delivery and U.S. Mail this 25th day of September, 1998 to the following:

Beth Keating, Esq. *
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Donna L. Canzano
Patrick Knight Wiggins
Wiggins & Villacorta, P.A.
2145 Delta Boulevard
Suite 200
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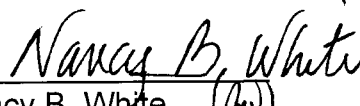
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3625 Queen Palm Drive
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Suzanne Fannon Summerlin, Esq.
Supra Telecommunications and
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Fax. No. (850) 656-5589

Amanda Grant
BellSouth Telecommunications, Inc.
Regulatory & External Affairs
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Atlanta, Georgia 30375

Norman H. Horton, Jr.
Messer, Caparello & Self, P.A.
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Nancy B. White (NW)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: BellSouth Telecommunications,) Docket No.: 980947-TL
Inc. 's Petition for Waiver for the)
Boca Raton Boca Teeca Central)
Office)
_____) Filed: September 25, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
RESPONSE 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 Response to the Florida Public Service Commission Staff's ("Staff") First Request for Production of Documents, dated August 21, 1998.

GENERAL RESPONSE AND OBJECTIONS

1. With regard to Staff's definition of "document" or "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's 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. The following Specific Responses are given subject to the above-stated General Responses and Objections.

DOCUMENT NUMBER-DATE

10653 SEP 25 88

FPSC-RECORDS/REPORTING

SPECIFIC RESPONSE

4. With respect to Request No. 1, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

Respectfully submitted this 25th day of September, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (RW)

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NANCY B. WHITE
Assistant General Counsel-Florida

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

September 25, 1998

Via Hand Delivery

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

Re: Docket No. 980947-TL
Waiver for Boca Raton/Boca Teeca Central Office

Dear Ms. Keating:

Enclosed is BellSouth Telecommunication's Inc.'s Response to Staff's First Set of Interrogatories and First Request for Production of Documents.

Sincerely,

Nancy B. White
(PW)

Nancy B. White

Enclosures

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