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Legal Department

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02 OCT -9 PM 4:50

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RECORDS AND
REPORTING

October 9, 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. 980948-TL
Temp. Waiver Miami/Palmetto Central Office

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Responses and Objections to WorldCom Technologies, Inc.'s First Request for Production of Documents and Motion for Protective Order, 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.

- ~~OTI~~
- ~~SVM~~
- ~~T~~ SEC
- ~~RCH~~
- ~~OPC~~
- ~~LIN~~
- ~~T~~ LEG
- ~~EAG~~
- ~~CTR~~
- ~~CAF~~

Sincerely,

Nancy B. White

Nancy B. White

(PW)

Enclosures

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

over ~~CMU~~

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DOCUMENT NUMBER-DATE

11191 OCT-98

FPSC RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 980948-TL

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

*Hand-Delivery and U.S. Mail this 9th day of October, 1998 to the following:

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Nancy B. White (for)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: BellSouth Telecommunications,) Docket No.: 980948-TL
 Inc. 's Petition for Waiver for the)
 Miami Palmetto Central Office)
 _____) Filed: October 9, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES AND
 OBJECTIONS TO WORLDCOM TECHNOLOGIES, 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 WorldCom Technologies, Inc.'s ("WorldCom") First Request for Production of Documents.

GENERAL RESPONSES

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

1. BellSouth has interpreted WorldCom'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.

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

WorldCom 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 refers WorldCom to BellSouth's response to Request No. 2.

6. With respect to Request No. 2, 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 WorldCom entering into a Protective Agreement with BellSouth.

7. With respect to Request No. 3, BellSouth refers WorldCom to BellSouth's response to Request No. 2.

8. With respect to Request No. 4, 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 WorldCom entering into a Protective Agreement with BellSouth.

9. With respect to Request No. 5, 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 WorldCom entering into a Protective Agreement with BellSouth.

Respectfully submitted this 9th day of October, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty

ROBERT G. BEATTY

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c/o Nancy Sims

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