

RECEIVED-EPSC

MARY K. KEYER  
General Attorney

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

90 JAN 13 PM 4:51

RECORDS AND  
REPORTING

January 13, 1999

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

RE: Docket No. 981052-TP

Dear Mrs. Bayo:

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

ACK \_\_\_\_\_

AFA \_\_\_\_\_

APP \_\_\_\_\_

CAF \_\_\_\_\_

CMU *[Signature]*

CTR \_\_\_\_\_ Enclosures

EAG \_\_\_\_\_

LEG 2 cc: All Parties of Record

LIN 3 M. M. Criser, III

OPC \_\_\_\_\_ W. J. Ellenberg (w/o enclosures)

RCH \_\_\_\_\_

SEC 1

WAS \_\_\_\_\_

OTH \_\_\_\_\_

RECEIVED & FILED  
*[Signature]*  
EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

00498 JAN 13 99


EPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE**  
**Docket No. 981052-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via U.S. Mail this 13<sup>th</sup> day of January, 1999, to the following:

Andrea K. Welch  
Telephone Company of Central  
Florida, Inc.  
3599 W. Lake Mary Boulevard  
Suite E  
Lake Mary, Florida 32746  
(407) 328-5002

Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter, Reeves, McGlothlin,  
Davidson, Decker, Kaufman,  
Arnold & Steen, P.A.  
117 South Gadsden Street  
Tallahassee, FL 32301  
(850) 222-2525  
Attys. for TCCF

  
\_\_\_\_\_  
Mary K. Keyer

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition by Telephone Company	)	
of Central Florida, Inc. for resolution of	)	Docket No. 981052-TP
Items under dispute in resale agreement	)	
with BellSouth Telecommunications, Inc.	)	Filed: January 13, 1999

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES  
AND OBJECTIONS TO TCCF'S FIFTH  
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 Telephone Company of Central Florida, Inc.'s ("TCCF") First Request for Production of Documents dated December 14, 1998.

**GENERAL RESPONSES**

1. BellSouth objects to TCCF's proposed "Instruction" relating to details of privileged documents. To the extent a document responsive to any of the requests is subject to an applicable privilege, some of the information requested by TCCF would be similarly privileged and therefore not subject to discovery. Notwithstanding this objection, BellSouth agrees to identify any documents withheld on the basis of privilege.

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

3. BellSouth does not believe it was TCCF'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.

### **SPECIFIC RESPONSES**

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

1. Provide the most current revision of BellSouth's Products and Services Interval Guide, Resale Option A.

**Response:** The BellSouth Product and Services Interval Guide – Resale Option A, includes Consumer and Small Business services and features. The intervals established for resale are the same as the intervals offered for retail. It was not necessary to establish new intervals for Consumer, Small Business or BBS products and services, since the provisioning requirements are the same in resale and retail. Therefore, the Interval Guide no longer has a Resale Option A.

2. Provide all documents, memos, studies, analyses and other materials relating to the development, purpose and the specific application of the service intervals outlined within the Guide. As to this request, do not simply refer to the Interval Guide, but provide information as how intervals were calculated and/or developed.

**Response:** BellSouth has no documents responsive to this request.

3. Provide all documents, memos, studies, analyses and other materials relating to the calculation of service intervals currently provided to BellSouth resellers.

**Response:** See BellSouth's response to Requests 1 and 2.

4. Provide all workpapers associated with BellSouth's receipt, processing and final completion of TCCF PON numbers: C3247B, C3264, C3267A, C3273, C3278, C3278A, C3279, C3303, C3309, C3312, C3314 and C3331.

**Response:** The requested documents are proprietary and will be provided subject to the execution of a protective agreement.

5. Provide copies of BellSouth tariffs for the state of Florida which identify all fees currently charged to the reseller for the processing of all types of orders and service requests.

**Response:** See response to Request 6 for the requested information as it relates to BellSouth's residential and business customers because it provides the foundation for the remainder of this response.

Fees currently charged to the reseller for the processing of all types of orders and service requests, which are not in BellSouth's tariffs in Florida at this time, may apply to Resellers if orders are processed via an arrangement such as an interconnection agreement.

6. Provide copies of BellSouth tariffs for the state of Florida which identify all fees currently charged to BellSouth end-user customers (business and residential) for the processing of all types of orders and service requests. In

response to this request, do not refer TCCF to the BellSouth website. Provide all materials which support BellSouth's claim that parity exists.

**Response:** BellSouth's tariff pages are being provided.

7. Provide all workpapers, computer runs, analyses and other materials which exist that will substantiate BellSouth's claim that parity of service exists between the service provided by BellSouth to its end-user customers (business and residential) and the service provided by BellSouth to the reseller.

**Response:** The BellSouth Service Quality Measurements (SQM) reports which substantiate BellSouth's claim that parity of service exists between the service provided by BellSouth to its end-user customers (business and residential) and the service provided by BellSouth to the Reseller are available on a monthly basis on the BellSouth Internet Web site at <https://clec.bellsouth.com>. These reports are posted on the 15<sup>th</sup> day of each month with the previous month's data. The BellSouth and ALEC aggregate reports are available to anyone. ALEC specific reports are available but are user ID and password protected so that individual ALECs only have access to their specific reports. TCCF specific reports are available. If TCCF would like to have access to these through the Internet, it can do so by contacting its BellSouth account team. BellSouth is providing a hard copy of these reports in response to this request.

8. Provide all orders referenced in witness Arrington's direct testimony at page 3, lines 10-16.

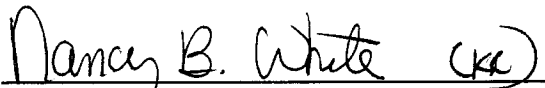
**Response:** The requested documents are being provided.

9. Provide all input, output, assumptions, analyses, models or any other information used to derive the information set out in Ms. Caldwell's exhibits DDC-1 and DDC-2.

**Response:** The workpapers and supporting documentation for the Operational Support Systems Electronic Interface and Manual Processing Cost Studies are proprietary and will be provided subject to the execution of a protective agreement.

Respectfully submitted this 13th day of January 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

 (cc)

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

 (cc)

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

146952