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Legal Department

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MARY K. KEYER
General Attorney

50 JAN 15 PM 4:29

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

RECORDS AND
REPORTING

January 15, 1999

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. 981052-TP

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Responses and Objections to Staff's First Expedited 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,

Mary K. Keyer
Mary K. Keyer

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG 2
- LIN 3
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

Enclosures

cc: All parties of record
M. M. Criser, III
N. B. White
William J. Ellenberg II (w/o enclosures)

RECEIVED & FILED

[Signature]
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

~~00602~~ JAN 15 99

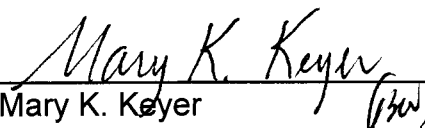
FPSC-RECORDS/REPORTING

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 15th 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 (for)

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 15, 1999

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES
AND OBJECTIONS TO STAFF'S FIRST EXPEDITED
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 Staff of the Florida Public Service Commission's ("Staff") First Expedited Request for Production of Documents dated December 23, 1998.

GENERAL RESPONSES

1. With regard to Staff's definition of "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 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.

DOCUMENT NUMBER-DATE

00632 JAN 15 99

PROD-RECORDS/REPORTING

SPECIFIC RESPONSES

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

1. Please provide all associated work papers and source documents for the derivation requested in Staff's First Set of Interrogatories No. 1(b).

Response: See attached Operational Support Systems Electronic Interface Cost Study Input Sheet, Workpapers 1-12A and Attachment A. This information is proprietary and is being provided subject to BellSouth's Request for Confidential Classification filed concurrently with this response.

2. Please provide all associated work papers and source documents for the derivation requested in Staff's First Set of Interrogatories No. 2(b).

Response: See BellSouth's response to Request 1.

3. Please provide all associated work papers and source documents for the derivation requested in Staff's First Set of Interrogatories No. 3(b).

Response: See BellSouth's response to Request 1.

4. Please provide all associated work papers and source documents for the derivation requested in Staff's First Set of Interrogatories No. 4(b).

Response: See BellSouth's response to Request 1.

5. Please provide all associated work papers and source documents for the derivation requested in Staff's First Set of Interrogatories No. 5.

Response: See Attachment No. 1 for work papers and supporting documents associated with the Land and Buildings factors.

6. Please provide all associated work papers and source documents for the derivation requested in Staff's First Set of Interrogatories No. 6(b).

Response: See BellSouth's response to Request 1.

7. Please provide all associated work papers and source documents for the derivation requested in Staff's First Set of Interrogatories No. 7(b).

Response: See BellSouth's response to Request 1.

8. Please provide all associated work papers and source documents for the derivation requested in Staff's First Set of Interrogatories No. 8(b).

Response: See BellSouth's response to Request 1.

9. Please provide all associated work papers and source documents for the derivation requested in Staff's First Set of Interrogatories No. 9(b).

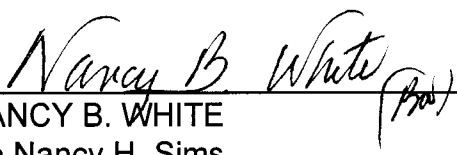
Response: See BellSouth's response to Request 1.

10. Please provide, on CD-ROM, the TELRIC calculator used to derive the results in Exhibit DDC-2.

Response: This was previously filed December 28, 1998, subject to BellSouth's Notice of Intent filed that same day.

Respectfully submitted this 15th day of January, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.



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