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4-20-3 11:4:15

February 3, 1999

BY HAND DELIVERY

Ms. Blanca Bayo, Director
Division of Records and Reporting
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket Nos. **981642-TP** and 981745-TP

Dear Ms. Bayo:

Enclosed for filing on behalf of e.spire Communications, Inc. are an original and fifteen copies of e.spire Communication, Inc.'s Objections to BellSouth's First Request for Production of Documents in the above-captioned dockets.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

ACK _____

AFA _____

APP _____

CAF _____

CH *Javaz*

CTR _____

EAC _____

FE 3 NHH/amb
Enclosures

LR 5 cc: Magdalen Blessey Bickford, Esq.
Parties of Record

OPC _____

RCH _____

SLC 1

WTR _____

Thank you for your assistance with this filing.

Sincerely,



Norman H. Horton, Jr.

RECEIVED & FILED
[Signature]
FEDERAL BUREAU OF INVESTIGATION

DOCUMENT NUMBER-DATE

01399 FEB-38

FEDSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Intermedia Communications, Inc.)
 for Arbitration with BellSouth Telecommunications, Inc.) Docket No. 981642-TP
 Pursuant to the Telecommunications Act of 1996)
 _____)

In re: Petition by e.spire Communications Inc. and)
 American Communication Services of Tampa, Inc.,)
 American Communications Service of Jacksonville, Inc.) Docket No. 981745-TP
 for Arbitration of an Interconnection Agreement with) Filed: February 3, 1999
 BellSouth Telecommunications, Inc., Pursuant to)
 Section 252(b) of the Telecommunications Act of 1996)
 _____)

**e.spire COMMUNICATIONS, INC.'S OBJECTIONS TO
 BELLSOUTH'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Pursuant to Order No. PSC-99-0090-PCO-TP e.spire Communications, Inc. ("e.spire"), through its undersigned herewith submits its objections to the First Request for Production of Documents propounded by BellSouth.

1. e.spire objects to each Request for Production to the extent that the request seeks information and/or documents which are proprietary and confidential.
2. e.spire objects to each Request for Production to the extent that the request seeks to have e.spire produce documents that are public records or documents which are in the possession of BellSouth.

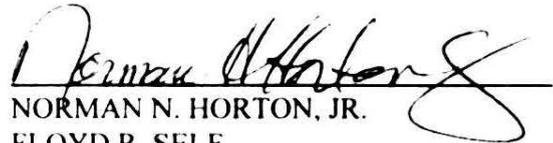
DOCUMENT NUMBER-DATE

01399 FEB-3 99

FPSC-RECORDS/REPORTING

3. e.spire objects to each Request for Production to the extent that the request seeks to have e.spire produce documents that relate to issues which the Commission may strike from this proceeding.

Respectfully submitted,



NORMAN N. HORTON, JR.
FLOYD R. SELF
Messer, Caparello & Self, P.A.
P. O. Box 1876
Tallahassee, FL 32302-1876
(850) 222-0720

Attorneys for e.spire Communications, Inc.

CERTIFICATE OF SERVICE

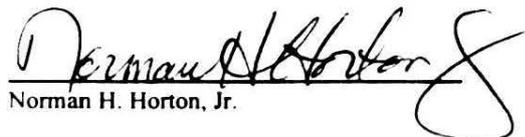
I HEREBY CERTIFY that true and correct copies of e.spire Communications, Inc.'s Objections to BellSouth's First Request for Production of Documents in Docket Nos. 981642-TP and 981745-TP have been served upon the following parties by Hand Delivery (*) and/or U. S. Mail this 3rd day of February, 1999.

June McKinney, Esq.*
Division of Legal Services, Room 370
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Ms. Nancy White
c/o Ms. Nancy Sims
BellSouth Telecommunications, Inc.
150 S. Monroe Street, Suite 400
Tallahassee, FL 32301

Mary Jo Peed, Esq.
BellSouth Telecommunications, Inc.
675 West Peachtree Street, NE
Atlanta, GA 30375

Patrick K. Wiggins, Esq.
Donna Canzano, Esq.
Wiggins & Villacorta, P.A.
Post Office Drawer 1657
Tallahassee, FL 32302


Norman H. Horton, Jr.