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Legal Department

BENNETT L. ROSS
General Attorney

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BellSouth Telecommunications, Inc.
180 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 336-6783

RECORDS AND
REPORTING

February 22, 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. 981745-TP

Dear Mrs. Bayo:

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

Bennett L. Ross

Bennett L. Ross (BR)

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU Javanya
- CTR _____ Enclosures
- EAG _____
- LEG 2 cc: All Parties of Record
- LIN 5 M. M. Criser, III
- OPC _____ W. J. Ellenberg II
- RCH _____
- SEC 1
- WAS _____
- OTH _____

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FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition by Intermedia Communications Inc.) for Arbitration with BellSouth Telecommunications,) Inc., Pursuant to the Telecommunications Act of 1996)	Docket No. 981642-TP
In re: Petition by e.spire Communications, Inc.) And American Communications Services of Tampa,) Inc., American Communications Services of) Jacksonville, Inc. for Arbitration of an) Interconnection Agreement with BellSouth) Telecommunications, Inc. Pursuant to Section 252(b)) Of the Telecommunications Act of 1996)	Docket No. 981745-TP
	FILED: Feb. 22, 1999

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
OBJECTIONS TO STAFF'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS**

BellSouth Telecommunications, Inc., ("BellSouth" or "Company"), hereby files, pursuant to Rule 25-22.034 and 25-22.035, Florida Administrative Code, and Rules 1.340 and 1.280(b), Florida Rules of Civil Procedure, the following Objections to the First Request for Production of Documents to BellSouth of the Staff of the Florida Public Service Commission ("Staff").

GENERAL OBJECTIONS

BellSouth makes the following General Objections to Staff's First Request for Production of Documents, which objections will be incorporated by reference into BellSouth's specific responses when its responses are served on Staff.

1. BellSouth objects to the requests to the extent that such requests seek to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or

other persons that are not parties to this case on the grounds that such requests are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. BellSouth has interpreted the discovery requests in this docket 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.

3. BellSouth objects to each and every request and instruction to the extent that such request or instruction calls for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. BellSouth objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

5. 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 Staff requests proprietary confidential business information which is not subject to the "trade secrets" privilege, BellSouth will make such information available to counsel for Staff subject to a Notice of Intent in which Staff agrees to treat the information as confidential and any other general or specific objections contained herein.

6. 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.

7. In any instance in which BellSouth agrees to produce documents, they will be produced at a mutually agreeable time and place. In instances in which the documentation is so voluminous that copying or transporting the documents would be burdensome, BellSouth will make the documents available for review upon BellSouth's premises where the documents are located.

SPECIFIC OBJECTION

BellSouth objects to Staff's Request No. 1 in which the Staff is requesting "copies of all documents that BellSouth has been requested to produce by any party in this docket to date." BellSouth will produce such documents, subject to the foregoing General Objections and those objections BellSouth has raised in response to the requests for production of documents by the other parties to this docket. BellSouth

objects to producing documents requested by Intermedia Communications, Inc. on grounds that the parties have extended their existing Interconnection Agreement and Intermedia has agreed to dismiss its petition for arbitration.

BellSouth objects to Staff's Request No. 2 in which the Staff is requesting "responses to all interrogatories propounded upon BellSouth by any party in this docket to date." BellSouth will produce such responses, subject to the foregoing General Objections and those objections BellSouth has raised in response to the various interrogatories propounded by the parties to this docket. BellSouth objects to producing responses to interrogatories propounded by Intermedia Communications, Inc. on grounds that the parties have extended their existing Interconnection Agreement and Intermedia has agreed to dismiss its petition for arbitration.

Respectfully submitted this 22nd day of February, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

NANCY B. WHITE (hr)
c/o Nancy Sims
150 South Monroe Street, #400
Tallahassee, Florida 32301
(305)347-5555

William J. Ellenberg II

WILLIAM J. ELLENBERG II (hr)
THOMAS B. ALEXANDER
BENNETT L. ROSS
675 West Peachtree Street, #4300
Atlanta, Georgia 30375
(404)335-0711

CERTIFICATE OF SERVICE

Docket Nos. 981642-TP and 981745-TP

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

Federal Express this 22nd day of February, 1999 to the following:

**Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32309-0850**

**Brad E. Mutschelknaus
KELLEY DRYE & WARREN LLP
1200 Nineteenth Street, N.W.
Suite 500
Washington, D.C. 20036
Tel. No. (202) 955-9800**


**Norman H. Horton, Jr.
Floyd R. Self
MCCSER CAPARELLO & SELF, P.A.
215 South Monroe Street
Suite 701
Tallahassee, FL 32302-1876
Tel. No. (850) 222-0720**

**Riley M. Murphy
James C. Falvey
E.spire Communications, Inc.
133 National Business Parkway
Suite 200
Annapolis Junction, Maryland 20701
Tel. No. (301) 817-4200**

**Donna L. Canzano
Patrick Knight Wiggins
Wiggins & Villacorta, P.A.
2145 Delta Boulevard
Suite 200
P.O. Drawer 1657
Tallahassee, FL 32302
Tel. No. (850) 385-6007
Fax. No. (850) 385-6008**

**Jonathan E. Canis
Enrico C. Soriano
Kelley Drye and Warren LLP
1200 19th Street, N.W.
Fifth Floor
Washington, D.C. 20036
Tel. No. (202) 955-9800
Fax. No. (202) 955-9792**

**Scott A. Sapperstein
Senior Policy Counsel
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619-1309
Tel. No. (813) 829-4093
Fax. No. (813) 829-4923**


Bennett L. Ross 