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RECORDS AND REPORTING

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March 8, 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. 981011-TL

Dear Ms. Bayó:

Enclosed are an original and 15 copies of BellSouth Telecommunications, Inc.'s Responses and Objections to Teleport Communications Group Inc./TCG South Florida's First Request for Production of Documents and Motion for Temporary Protective Order. Please file this document 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.

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU 3 \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 1 Enclosures
- LIN 5 \_\_\_\_\_
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1 \_\_\_\_\_
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

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

Sincerely,

*J. Phillip Carver (cc)*

J. Phillip Carver

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DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE**

**Docket Nos. 980946-TL, 980947-TL, 980948-TL, 981011-TL, 981012-TL  
and 981250-TL**

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

U.S. Mail this 8th day of March, 1999 to the following:

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J. Phillip Carver

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: BellSouth Telecommunications, ) Docket No.: 981011-TL  
 Inc. 's Petition for Temporary Waiver )  
 for West Palm Beach Gardens )  
 Central Office )  
 \_\_\_\_\_ ) Filed: March 8, 1999

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES AND  
 OBJECTIONS TO TELEPORT COMMUNICATIONS  
 GROUP INC./TCG SOUTH FLORIDA'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 Teleport Communications Group Inc./TCG South Florida's ("TCG") First Request for Production of Documents.

**GENERAL RESPONSES**

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

1. BellSouth has interpreted TCG'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 TCG requests proprietary confidential business information which is not subject to the “trade secrets” privilege, BellSouth will make such information available to be reviewed by counsel for TCG upon BellSouth’s premises, pursuant to an appropriate

Protective Agreement and subject to any other general or specific objections contained herein.

### **SPECIFIC RESPONSES**

5. In response to TCG's Request to Produce No. 1, this request is for information provided in response to Supra Telecommunications and Information Systems, Inc.'s ("Supra") First Request for Production of Documents, to which BellSouth has previously responded. BellSouth hereby responds to this request by incorporating by reference its responses and objections to the above-noted request of Supra.

6. In response to TCG's Request to Produce No. 2, this request is for information provided in response to Supra Telecommunications and Information Systems, Inc.'s ("Supra") Second Request for Production of Documents, to which BellSouth has previously responded. BellSouth hereby responds to this request by incorporating by reference its responses and objections to the above-noted request of WorldCom.

7. In response to TCG's Request to Produce No. 3, this request is for information provided in response to Supra Telecommunications and Information Systems, Inc.'s ("Supra") First and Second Sets of Interrogatories, to which BellSouth has previously responded. BellSouth hereby responds to this request by incorporating by reference its responses and objections to the above-noted request of Supra.

8. In response to TCG's Request to Produce No. 4, this request is for information provided in response to e.spire Communications, Inc.'s ("e.spire")

First Request for Production of Documents, to which BellSouth has previously responded. BellSouth hereby responds to this request by incorporating by reference its responses and objections to the above-noted request of e.spire.

Respectfully submitted this 8th day of March, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

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