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Legal Department

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BellSouth Telecommunications, Inc.  
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RECORDS AND  
REPORTING

ORIGINAL

March 18, 1999

Mrs. Blanca S. Bayó  
Director, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

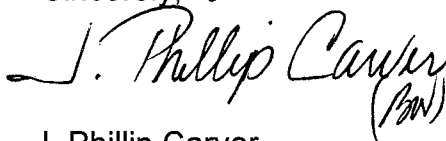
Re: Docket No. 980948-TL

Dear Ms. Bayó:

Enclosed are an original and 15 copies of BellSouth Telecommunications, Inc.'s Responses and Objections to Supra's First Supplemental Request for Production of Documents. 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.

Sincerely, -



J. Phillip Carver

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

Enclosures

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

RECEIVED & FILED

  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

03576 MAR 18 99

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: BellSouth Telecommunications, ) Docket No.: 980948-TL  
Inc. 's Petition for Temporary Waiver )  
for Miami Palmetto Central Office )  
\_\_\_\_\_ ) Filed: March 18, 1999

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES AND  
OBJECTIONS TO SUPRA TELECOMMUNICATIONS and INFORMATION  
SYSTEMS, INC.'s FIRST SUPPLEMENTAL 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 Supra Telecommunications and Information Systems, Inc.'s ("Supra") First Supplemental Request for Production of Documents.

**GENERAL RESPONSES**

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

1. BellSouth has interpreted Supra'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 Supra 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 Supra 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 Supra's Request to Produce No. 1, this request is for information provided in response to the Florida Public Service Commission Staff's ("Staff") 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 Staff.

6. In response to Supra's Request to Produce No. 2, this request is for information provided in response to WorldCom Technologies, Inc.'s ("WorldCom") 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 WorldCom.

Respectfully submitted this 18th day of March, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Nancy B. White*

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**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 18th day of March, 1999 to the following:

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