

J. PHILLIP CARVER
General Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0710

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

RECORDS AND
REPORTING

09 MAR 18 PM 4:46

RECEIVED-FPSC

Re: Docket No. 981012-TL

Dear Ms. Bayó:

Enclosed are an original and 15 copies of BellSouth Telecommunications, Inc.'s Responses and Objections to Staff's First 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
J. Phillip Carver

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

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

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

2 w attached Maps

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file in 980946 only

DOCUMENT NUMBER-DATE

03591 MAR 18 99

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: BellSouth Telecommunications,)
Inc.'s Petition for temporary waiver of)
Physical collocation requirement set) Docket No. 981012-TL
Forth in the 1996 Telecommunications)
Act and the FCC's First Report and)
Order, for the West Palm Beach) Filed: March 18, 1999
Gardens Central Office)
_____)

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES
AND OBJECTIONS TO STAFF'S FIRST 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 Request for Production of Documents dated February 11, 1999.

GENERAL RESPONSES

1. With regard to Staff's definition of "document", BellSouth has made a diligent, good faith attempt to locate documents responsive to the scope of Staff's individual requests for documents.

2. BellSouth objects to Staff's definition of "BellSouth," "you" and "your." It appears that Staff, through its definition of these words, is attempting to obtain discovery of information in the possession, custody, or control of entities that are not parties to this docket. Requests for Production may only be directed to parties, and any attempt by Staff to obtain discovery from non-parties should

DOCUMENT NUMBER-DATE

03591 MAR 18 99

6888-RECORDS/REPORTING

be prohibited. See Rule 1.340, Florida Rules of Civil Procedure; Broward v. Kerr, 454 So. 2d 1068 (4th D.C.A. 1984).

3. 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.


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


SPECIFIC RESPONSES


5. With respect to Request No. 1, BellSouth will produce the requested documents at a mutually agreeable time and place. The documents do not reflect space allocated for physical collocation because no space is available.


Respectfully submitted this 18th day of March, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE 
c/o Nancy Sims
150 South Monroe Street, #400
Tallahassee, Florida 32301
(305) 347-5558



WILLIAM J. ELLENBERG II 
J. PHILLIP CARVER
675 West Peachtree Street, #4300
Atlanta, Georgia 30375
(404) 335-0710

155767

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:

Beth Keating, Esq.
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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

Steve Brown
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619-1309
Tel. No. (813) 829-0011
Fax. No. (813) 829-4923

Floyd R. Self, Esq.
Messer, Caparello & Self, P.A.
215 South Monroe Street
Suite 701
Tallahassee, FL 32301-1876
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359

Mr. Brian Sulmonetti
WorldCom Technologies, Inc.
1515 South Federal Highway
Suite 400
Boca Raton, FL 33432
Tel. No. (561) 750-2940
Fax. No. (561) 750-2629

David V. Dimlich, Esq.
Legal Counsel
Supra Telecommunications &
Information Systems, Inc.
2620 S.W. 27th Avenue
Miami, FL 33133
Tel. No. (305) 476-4235
Fax. No. (305) 443-1078

Amanda Grant
BellSouth Telecommunications, Inc.
Regulatory & External Affairs
675 West Peachtree Street, N.E.
Room 38L64
Atlanta, Georgia 30375

Norman H. Horton, Jr.
Messer, Caparello & Self, P.A.
215 S. Monroe Street
Suite 701
Tallahassee, Florida 32301-1876
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Represents e.spire»

James C. Falvey, Esq.
e.spire» Communications, Inc.
133 National Business Parkway
Suite 200
Annapolis Junction, Maryland 20701
Tel. No. (301) 361-4298
Fax. No. (301) 361-4277

Kenneth A. Hoffman, Esq.
John R. Ellis, Esq.
Rutledge, Ecenia, Underwood,
Purnell & Hoffman, P.A.
P.O. Box 551
Tallahassee, FL 32301
Tel. No. (850) 681-6788
Fax. No. (850) 681-6515

Steven Gorosh
Vice President and General Counsel
NorthPoint Communications, Inc.
222 Sutter Street, 7th Floor
San Francisco, CA 94108
Tel. No. (415) 659-6518
Fax. No. (415) 658-4190

Charles A. Hudak, Esq.
Jeremy D. Marcus, Esq.
Gerry, Friend & Saprnov, LLP
Three Ravinia Drive, Suite 1450
Atlanta, GA 30346-2131
Tel. No. (770) 399-9500
Fax. No. (770) 395-0000
Attys. for ACI Corp.

Jeffrey Blumenfeld, Esq.
Elise P.W. Kiely, Esq.
Blumenfeld & Cohen
1615 M Street, NW
Suite 700
Washington, DC 20036
Tel. No. (202) 955-6300

Fax. No. (202) 955-6460
Attys. for ACI Corp.

Peter M. Dunbar, Esq.
Barbara D. Auger, Esq.
Pennington, Moore, Wilkinson
& Dunbar, P.A.
Post Office Box 10095
Tallahassee, FL 32302-2095
Tel. (850) 222-3533
FAx (850) 222-2126
Attys for Tim Warner Telecom

Carolyn Marek
VP of Reg. Affairs
Time Warner Communications
233 Bramerton Court
Franklin, TN 37069
Tel. (615) 376-6404
Fax (615) 376-6405

Monica M. Barone
Sprint Communications Company
Limited Partnership
3100 Cumberland Circle
Mailstop GAATLN0802
Atlanta, GA 30339

James D. Earle, Esq.
Covad Communications, Inc. d/b/a
DIECA Communications
6849 Old Dominion Drive
Suite 220
McLean, VA 22101
Tel: (703) 734-6221
Fax: (703) 734-5474

Richard D. Melson
Gabriel E. Nieto
Hopping Green Sams & Smith
Post Office Box 6526
Tallahassee, FL 32314
Attys. for ACI Corp.

Peter M. Dunbar, Esq.
Barbara D. Auger, Esq.
Pennington, Moore, Wilkinson,
& Dunbar, P.A.
Post Office Box 10095
Tallahassee, FL 32302
Tel.: (850) 222-3533
Fax: (850) 222-2126
Attys for Time Warner

Carolyn Marek
Time Warner Communications
233 Bramerton Court
Franklin TN 37069
Tel.: (615) 376-6404
Fax: (615) 376-6405



J. Phillip Carver (P)