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RECEIVED-EPSC

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RECORDS AND REPORTING

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. 981011-TL

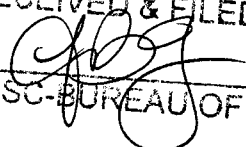
Dear Ms. Bayó:

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.

RECEIVED & FILED

Sincerely,



FPSC-BUREAU OF RECORDS
J. Phillip Carver (ba)

- KCK _____
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG 2 w/attach
- LIN 5
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH file in 980946 only

Enclosures

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

DOCUMENT NUMBER-DATE

03593 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. 981011-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

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FPSC-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.

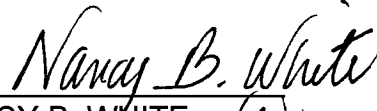
4. The following Specific Responses are given subject to the above-stated General Responses and Objections.

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.



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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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