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April 19, 1999

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RECORDS AND REPORTING

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

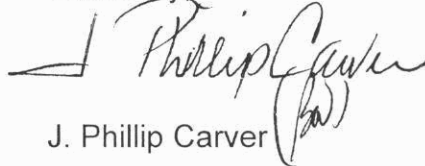
Re: Docket Nos. 980946-TL, 980947-TL, 980948-TL
981011-TL, 981012-TL and 981250-TL

Dear Ms. Bayó:

Enclosed are an original and 15 copies of BellSouth Telecommunications, Inc.'s Responses and Objections to Sprint's First Request for Production of Documents and Motion for Protective Order. Please file this document in the captioned matter.

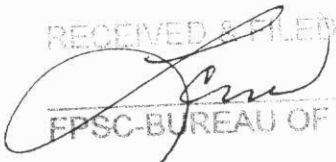
A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me.

Sincerely,


J. Phillip Carver

4
Enclosures

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

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
0494 | APR 19 99
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 19th day of April, 1999 to the following:

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* Protective Agreements


J. Phillip Carver

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Waiver of Physical) Docket No.: 980946-TL
Collocation Requirements Set Forth)
In the Telecommunications Act of 1996)
And the FCC's First Report and Order,)
for the Daytona Beach Port Orange Central)
Office, By BellSouth Telecommunications, Inc.)

In re: Petition for Waiver of Physical) Docket No.: 980947-TL
Collocation Requirements Set Forth)
In the Telecommunications Act of 1996)
And the FCC's First Report and Order,)
for the Boca Raton Boca Teeca Central)
Office, By BellSouth Telecommunications, Inc.)

In re: Petition for Waiver of Physical) Docket No.: 980948-TL
Collocation Requirements Set Forth)
In the Telecommunications Act of 1996)
And the FCC's First Report and Order,)
for the Miami Palmetto Central)
Office, By BellSouth Telecommunications, Inc.)

In re: Petition for Waiver of Physical) Docket No.: 981011-TL
Collocation Requirements Set Forth)
In the Telecommunications Act of 1996)
And the FCC's First Report and Order,)
For the West Palm Beach Gardens)
Central Office, By BellSouth)
Telecommunications, Inc.)

In re: Petition for Waiver of Physical) Docket No.: 981012-TL
Collocation Requirements Set Forth)
In the Telecommunications Act of 1996)
And the FCC's First Report and Order,)
For the North Dade Golden Glades)
Central Office, By BellSouth)
Telecommunications, Inc.)

In re: Petition for Waiver of Physical) Docket No.: 981250-TL
Collocation Requirements Set Forth)
In the Telecommunications Act of 1996)
And the FCC's First Report and Order,)
for the Lake Mary Main Central)
Office, By BellSouth Telecommunications, Inc.)

) Dated: April 19, 1999

DOCUMENT NUMBER-DATE

04941 APR 19 99

FPSC-RECORDS/REPORTING

**BELLSOUTH TELECOMMUNICATIONS, INC.'s RESPONSES
AND OBJECTIONS TO SPRINT'S FIRST REQUEST FOR PRODUCTION
OF DOCUMENTS AND MOTION FOR PROTECTIVE ORDER**

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, hereby submits the following Responses and Objections to Sprint Communications Company, L.P., ("Sprint") First Request for Production of Documents to BellSouth dated, March 19, 1999.

GENERAL RESPONSES

BellSouth makes the following General Responses to Sprint's First Request for Production of Documents.

1. BellSouth has interpreted Sprint's requests to apply to BellSouth's regulated intrastate operations in Florida and limits its Answers 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 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.

MOTION FOR TEMPORARY PROTECTIVE ORDER

3. BellSouth objects to each and every request to the extent that the information requested constitute "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that Sprint's requests request

proprietary confidential business information which is not subject to the “trade secrets” privilege, BellSouth will make such information available to counsel for Sprint pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

RESPONSES TO SPECIFIC RESPONSES

Subject to, and without waiver of, the foregoing general responses, BellSouth enters the following specific responses with respect to Sprint’s requests:

4. With respect to Request No. 1, BellSouth will make responsive documents that are in its possession, custody and control available for review at its office in Tallahassee subject to the Motion for Temporary Protective Order set forth above.

5. With respect to Request Nos. 2, 3, and 4, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place subject to the Motion for Temporary Protective Order set forth above.

6. With respect to Request No. 5, BellSouth has no responsive documents in its possession, custody, or control.

Respectfully submitted this 19th day of April, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

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