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RECORDS AND  
REPORTING

June 14, 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. 990149-TP**

Dear Ms. Bayó:

Enclosed are an original and 15 copies of BellSouth Telecommunications, Inc.'s Responses and Objections to MediaOne'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* (KR)

J. Phillip Carver

ORIGINAL

Enclosures

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

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*Monte R.*  
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**CERTIFICATE OF SERVICE**  
**Docket No. 990149-TP**

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

U.S. Mail this 14th day of June, 1999 to the following:

Beth Keating, Esq.  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Mr. James P. Campbell  
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Telecommunications, Inc.  
7800 Belfort Parkway  
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Jacksonville, Florida 32256-6925  
Tel. (904) 619-5686  
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Graham & Moody  
101 North Gadsden Street  
Tallahassee, Florida 32301  
Tel. (850) 222-6656  
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Atty. for MediaOne

Susan Keesen  
MediaOne Group, Inc.  
188 Inverness Drive West  
6th Floor  
Englewood, Colorado 80112  
Tel. (303) 858-3566  
Fax. (303) 858-3487

  
J. Phillip Carver

In re: Petition by MediaOne Florida	)	
Telecommunications, Inc. for	)	
Arbitration of an interconnection	)	Docket No. 990149-TP
Agreement with BellSouth	)	
Telecommunications, Inc. pursuant	)	
to Section 252(b) of the	)	Filed: June 14, 1999
Telecommunications Act of 1996	)	
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**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES AND  
 OBJECTIONS TO MEDIAONE FLORIDA TELECOMMUNICATIONS, INC.'S  
 FIRST REQUEST FOR PRODUCTION OF DOCUMENTS  
 AND MOTION FOR 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 Protective Order to MediaOne Florida Telecommunications, Inc.'s ("MediaOne") First Request for Production of Documents.

**GENERAL RESPONSES**

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

1. BellSouth has interpreted MediaOne'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 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. Further, Section 364.24, Florida Statutes prohibits the disclosure of certain customer account information except as

required by “subpoena, court order, other process of court, or as otherwise allowed by law.” Accordingly, BellSouth objects to producing any information, the production of which is prohibited by this statute. To the extent that MediaOne has requested proprietary confidential business information that is not subject to the “trade secrets” privilege or Section 364.24, BellSouth will make this information available to be reviewed by counsel for MediaOne at a mutually agreeable time and place, subject to an appropriate Protective Agreement and subject to any other general or specific objections contained herein.

### **SPECIFIC RESPONSES**

1. In response to request to Produce No. 1, BellSouth states that it has no responsive documents in its custody, possession or control.

2. In response to Request to Produce No. 2, BellSouth objects to producing the requested documents because these documents are (1) voluminous and (2) contained in the publically accessible records of the Florida Public Service Commission. BellSouth should not be required to organize, copy and send to MediaOne voluminous documents that MediaOne can obtain from public records.

3. In response to Request to Produce No. 3, BellSouth agrees to produce the requested documents at a mutually agreeable time and place. However, these documents are confidential and proprietary. Therefore, BellSouth will produce them only after an appropriate confidentiality agreement is executed by MediaOne.

4. In response to request to Produce No. 4, BellSouth states that it has no responsive documents in its custody, possession or control.

5. In response to request to Produce No. 5, BellSouth states that it has no responsive documents in its custody, possession or control.

6. In response to request to Produce No. 6, BellSouth states that it has no responsive documents in its custody, possession or control.

Respectfully submitted this 14th day of June, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White (kr)

NANCY B. WHITE

c/o Nancy Sims

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