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ORIGINAL

October 15, 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 No. 990649-TP

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* (KR)

J. Phillip Carver

Enclosures

- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU 1
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 2
- MAS 5
- OPC \_\_\_\_\_
- PAI \_\_\_\_\_
- SEC 1
- WAW \_\_\_\_\_
- OTH \_\_\_\_\_

cc: All parties of record  
M. M. Criser, III  
N. B. White  
R. D. Lackey

RECORDED & FILED  
*me*  
DIVISION OF RECORDS & REPORTING

DOCUMENT NUMBER-DATE

12615 OCT 15 99

PSC-DIVISION OF RECORDS & REPORTING

**CERTIFICATE OF SERVICE  
Docket No. 990649-TP**

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

U.S. Mail this 15th day of October, 1999 to the following:

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J. Phillip Carver



## SPECIFIC RESPONSES

4. In response to Request to Produce No. 1, BellSouth will produce the requested documents at a mutually agreeable time and place.

5. In response to Request to Produce No. 2, BellSouth agrees to produce the requested documents at a mutually agreeable time and place. The responsive documents, however, are proprietary. Accordingly, BellSouth is filing a Notice of Intent to request confidential classification on this day.

6. In response to Request to Produce No. 3, BellSouth will produce the requested documents at a mutually agreeable time and place.

7. In response to Request to Produce No. 4, BellSouth agrees to produce the requested documents at a mutually agreeable time and place. The responsive documents, however, are proprietary. Accordingly, BellSouth is filing a Notice of Intent to request confidential classification on this day.

8. In response to Request to Produce No. 5, BellSouth will produce the requested documents at a mutually agreeable time and place.

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

10. In response to Request to Produce No. 7, BellSouth states that it has no responsive documents in its custody, possession or control.

Respectfully submitted this 15th day of October, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

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