MICHAEL P. GOGGIN General Attorney

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (305) 347-5561



February 23, 2000

COFES 23 PM 4: 4.1

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. 990455-TL, 990456-TL, 990457-TL and (990517-TL)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Specific Objections to Staff's First Set of Interrogatories Nos. 1-6, dated February 8, 2000, which we ask that you file in the captioned dockets.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Michael P. Goggir

cc: All Parties of Record Marshall M. Criser III R. Douglas Lackey Nancy B. White

of JAK SEIVED & FILED

OPC RRR 多配C

0

2 2502-00

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for review of proposed)	Docket No. 990517-TL
numbering plan relief for the 904 area)	
code)	
	j	Filed: February 23, 2000

BELLSOUTH TELECOMMUNICATIONS, INC.'S SPECIFIC OBJECTIONS TO STAFF'S FIRST SET OF INTERROGATORIES (Nos. 1-6)

BellSouth Telecommunications, Inc., ("BellSouth") pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.340 and 1.280, Florida Rules of Civil Procedure, files the following specific objections to the First Set of Interrogatories (Nos. 1-6) served by the Staff of the Florida Public Service Commission ("Staff") on February 8, 2000.

The objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the 10-day requirement set forth in the procedural order issued by the Florida Public Service Commission ("Commission") in the above-captioned docket. Should additional grounds for objection be discovered as BellSouth prepares its answers to the above-referenced interrogatories, BellSouth reserves the right to supplement, revise, or modify its objections at the time it serves its answers.

SPECIFIC OBJECTIONS

BellSouth enters the following specific objections with respect to Staff's requests:

Interrogatory No. 6: Are you aware of any carriers in the 904 NPA that are not LRN/LNP capable? If so, please identify the name(s), address, and telephone numbers of these companies.

Specific Objection: With respect to Interrogatory No. 6, BellSouth objects to this request on the grounds that the information requested includes business proprietary information pursuant to §364.183, Florida Statutes and customer proprietary information pursuant to §364.24, Florida Statutes. BellSouth considers such information confidential and maintains it as such. BellSouth will make its response available to the Commission subject to a Notice of Intent for Specified Confidential Classification.

Respectfully submitted this 23rd day of February, 2000.

: 1.-

BELLSOUTH TELECOMMUNICATIONS, INC.

NANCY B. WHITE

MICHAEL P. GOGGIN

c/o Nancy H. Sims

150 So. Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558

R. DOUGLAS LACKEY

Suite 4300

675 W. Peachtree St., NE

Atlanta, GA 30375

(404) 335-0747

198448

CERTIFICATE OF SERVICE Docket Nos. 990455-TL, 990456-TL, 990457-TL and (990517-TL)

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

(*) Hand Delivery and U.S. Mail this 23rd day of February, 2000 to the following:

Beth Keating *
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
Tel. No. (850) 413-6212
Fax No. (850) 413-6250

Richard H. Brashear ALLTEL Florida, Inc. 206 White Avenue, S.E. Live Oak, Florida 32060-3357 Tel. No. (904) 364-2517 Fax No. (904) 362-4950

Gwen Azama-Edwards City of Daytona Beach Post Office Box 2451 Daytona Beach, Florida 32115-2451 Tel. No. (904) 258-3168

Comm. Wayne Gardner
City of Deltona
Post Office Box 5550
Deltona, Florida 32728-5550

Michael A. Gross
Florida Cable Telecomm. Assoc., Inc.
310 N. Monroe Street
Tallahassee, Florida 32301
Tel. No. (850) 681-1990
Fax No. (850) 681-9676

Angela Green, General Counsel Florida Public Telecomm. Assoc. 125 South Gadsden Street Suite 200 Tallahassee, FL 32301-1525 Tel. No. (850) 222-5050 Fax No. (850) 222-1355 Bruce May Holland Law Firm Post Office Drawer 810 Tailahassee, FL 32302 Tel. No. (850) 224-7000 Fax No. (850) 222-8185

Deborah L. Nobles Northeast Fla. Tel. Co., Inc. Post Office Box 485 Macclenny, Florida 32063-0485 Tel. No. (904) 259-0639 Fax No. (904) 259-7722

F. B. (Ben) Poag Sprint-Florida, Inc. P.O Box 2214 (MC FLTLHO0107) Tallahassee, Florida 32316-2214 Tel. No. (850) 599-1027 Fax No. (407) 814-5700

Robert M. Weiss Volusia County 123 W. Indiana Ave. Room #205 DeLand, Florida 32720 Tel. No. (904) 822-5750 Fax No. (904) 822-5795

Carole Joy Barice, Esq.
James A. Fowler, Esq.
Fowler, Barice, Feeney & O'Quinn, P.A.
28 West Central Blvd.
Orlando, FL 32801
Tel. No. (407) 425-2684

Fritz Behring, City Manager City of Deltona P.O. Box 5550 800 Deltona Blvd. Deltona, FL 32728 Tel. No. (407) 860-7160

Charles J. Rehwinkel
Susan Masterton
Sprint-Florida, Inc.
P.O. Box 2214
Tallahassee, FL 32399-2214
MC FLTLHO0107
Tel. No. (850) 847-0244

Joe Assenzo Sprint PCS Legal Department 49000 Main Street, 11th Floor Kansas City, Missouri 64112 Tel. No. (816) 559-1000

Cheryl A. Tritt Kimberly D. Wheeler Morrison & Foerster, LLP 2000 Pennsylvania Avenue, N.W. Suite 5500 Washington, D.C. 20006 Tel. No. (202) 887-1500 Counsel for Lockheed Martin IMS

Harriet Eudy ALLTEL Florida, Inc. Post Office Box 550 Live Oak, Florida 32060

J. Jeffry Wahlen
Ausley & McMullen
Post Office Box 391
Tallahassee, Florida 32302
Tel. No. (850) 425-5471
Fax No. (850) 222-7560
Counsel for ALLTEL Florida

Peter M. Dunbar, Esq.
Karen M. Camechis, Esq.
Pennington, Moore, Wilkinson, Bell & Dunbar, P.A.
Post Office Box 10095
Tallahassee, FL 32302
Tel. No. (850) 222-3533
Fax No. (850) 222-2126

Carolyn Marek
Vice President of Regulatory Affairs
Southeast Region
Time Warner Communications
233 Bramerton Court
Franklin, TN 37069
Tel. No. (615) 376-6404
Fax No. (615) 376-6405

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
E-Mail: fself@lawfla.com

Tracy Hatch, Esq.
Marshal Rule, Esq.
AT&T Communications of the Southern States, Inc.
101 N. Monroe Street, Suite 700
Tallahassee, FL 32301
Tel. No. (850) 425-6364
Fax No. (850) 425-6361

C. Lee Fordham
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Kenneth Hoffman Rutledge Law Firm Post Office Box 551 Tallahassee, FL 32302 Tel. No. (850) 681-6788 Fax No. (850) 681-6515 Attys. for Omnipoint Communications

.

Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Kimberly D. Wheeler Morrison & Foerster Law Firm 2000 Pennsylvania Avenue, NW Washington, DC 20006 Tel. No. (202) 887-1500 Fax No. (202) 887-0763 Attys. For Lockheed Martin IMS

D. Wayne Milby Lockheed Martin IMS Communications Industry Services 1133 15th Street, N.W. Washington, DC 20005 Tel. No. (202) 756-5600

Gloria Johnson General Attorney BeilSouth Cellular Corp. 1100 Peachtree Street, N.E. Suite 910 Atlanta, Georgia 30309-4599

Kimberly Caswell
GTE Florida, Inc.
Post Office Box 110, FLTC0007
Tampa, Florida 33601-0110
Tel. No. (813) 483-2617

Donna Canzano McNulty MCI WorldCom, Inc. 325 John Knox Road The Atrium, Suite 105 Tallahassee, Florida 32303 Tel. No. (850) 422-1254 Fax No. (850) 422-2586

Brian Sulmonetti MCI WorldCom, Inc. 6 Concourse Parkway, Suite 3200 Atlanta, Georgia 30328 Tel. No. (770) 284-5493 Fax No. (770) 284-5488

Daniel H. Thompson
Berger Davis & Singerman
215 S. Monroe Street - Suite 705
Tallahassee, Florida 32301
Tel. No. (850) 561-3010
Fax No. (850) 561-3013
Attorney for ADT

<u>MIMUU F. CAN</u> Michael P. Goggin