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ORIGINAL
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REPORTING

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May 10, 2000

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

RE: Docket No. 990649-TP, Pricing of Unbundled Network Elements

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response and Objections to Staff's Fourth Request for Production of Documents. Please file these documents in the captioned docket.

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 on the parties shown on the attached Certificate of Service.

Sincerely,

Bennett L. Ross
Bennett L. Ross (BR)

Enclosures

cc: All Parties of Record
Marshal Criser
Nancy White

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing)
Of unbundled network elements)

DOCKET NO. 990649-TP

05/10/08

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES
AND OBJECTIONS TO STAFF'S FOURTH REQUEST
FOR PRODUCTION OF DOCUMENTS**

BellSouth Telecommunications, Inc. ("BellSouth"), hereby 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") Fourth Request for Production of Documents dated April 20, 2000.

GENERAL RESPONSE

1. In any instance in which BellSouth agrees to produce documents, they will be produced at a mutually agreeable time and place, with certain exceptions. These exceptions, identified with more specificity below, will only be produced in BellSouth's offices in Tallahassee, Florida.

SPECIFIC RESPONSES

2. In response to Staff's Request to Produce No. 11, BellSouth states that it has no documents responsive to this request.

3. In response to Staff's Request to Produce No. 12, BellSouth states that it has documents responsive to this request that fall into two categories. First, BellSouth has documents that have been produced for BellSouth by Standard & Poor's. These documents will

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FPSC-RECORDS/REPORTING

be produced at a mutually convenient time and place. The second category of documents include what has been produced to the staff in the past and generally referred to as "debt rating" manuals. These documents constitute highly confidential and proprietary business information. As in the past, BellSouth is willing to produce these documents for the Staff's review in BellSouth's offices in Tallahassee and should the Staff determine that it needs copies of specified pages of these manuals, BellSouth will produce copies for the Staff subject to the appropriate confidentiality filings. This is the same procedure that has been used in the past to handle these very sensitive documents and should suffice this time. BellSouth would note once again, however, that reviewing these manuals makes the Staff involved "insiders" within the meaning of that term as it is used by the Securities and Exchange Commission and proper steps should be taken to insure that any reviewers of this material are aware of that fact and the consequences thereof.

4. In response to Staff's Request to Produce No. 13, BellSouth states that it has documents responsive to this request that fall into two categories. First, BellSouth has documents that have been produced for BellSouth by Moody's Investor Services. These documents will be produced at a mutually convenient time and place. The second category of documents include what has been produced to the staff in the past and generally referred to as "debt rating" manuals. These documents constitute highly confidential and proprietary business information. As in the past, BellSouth is willing to produce these documents for the Staff's review in BellSouth's offices in Tallahassee and should the Staff determine that it needs copies of specified pages of these manuals, BellSouth will produce copies for the Staff subject to the appropriate confidentiality filings. This is the same procedure that has been used in the past to handle these very sensitive documents and should suffice this time. BellSouth would note once


again, however, that reviewing these manuals makes the Staff involved "insiders" within the meaning of that term as it is used by the Securities and Exchange Commission and proper steps should be taken to insure that any reviewers of this material are aware of that fact and the consequences thereof.

5. In response to Staff's Request to Produce No. 14, BellSouth has documents responsive to this request, most of which are testimony filed on BellSouth's behalf and touching upon the subjects included within this Request. These documents will be produced at a mutually convenient time and place.


6. In response to Staff's Request to Produce No. 15, BellSouth has no documents that are responsive to this request.

Respectfully submitted this 10th day of May, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.



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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 10th day of May, 2000 to the following:

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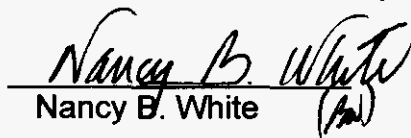
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(+) *Signed Protective Agreement*