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RECORDS AND  
REPORTING

May 15, 2000

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 (UNE Docket)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s General Objections to FCCA's First Request for Production of Documents (No. 1), dated May 5, 2000, which we ask that you file 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 to the parties shown on the attached Certificate of Service.

Sincerely,

*Michael P. Goggin*  
Michael P. Goggin

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

AFA 1  
APP \_\_\_\_\_  
CAF \_\_\_\_\_  
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*[Signature]*  
FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

05996 MAY 15 2000

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into	)	
pricing of unbundled network	)	Docket No. 990649-TP
elements	)	
<hr/>		Filed: May 15, 2000

**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
GENERAL OBJECTIONS TO FCCA'S FIRST  
REQUEST FOR PRODUCTION OF DOCUMENTS**

BellSouth Telecommunications, Inc., ("BellSouth" or "Company"), pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.350 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following General Objections to Florida Competitive Carriers Association ("FCCA's") First Request for Production of Documents (No. 1), dated May 5, 2000.

The objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the ten-day requirement set forth in the procedural order issued by the Florida Public Service Commission ("Commission") in the above-referenced docket. Should additional grounds for objection be discovered as BellSouth prepares its responses to the above-referenced request, BellSouth reserves the right to supplement, revise, or modify its objections at the time that it serves its responses on FCCA. Moreover, should BellSouth determine that a Protective Order is necessary with respect to any of the material requested by FCCA, BellSouth reserves the right to file a motion with the Commission seeking such an order at the time that it serves its responses on FCCA.

DOCUMENT NUMBER-DATE  
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FPSC-RECORDS/REPORTING

## **GENERAL OBJECTIONS**

BellSouth makes the following General Objections to FCCA's First Request for Production of Documents (the "request") which will be incorporated by reference into BellSouth's responses when they are served on FCCA.

1. BellSouth objects to the request to the extent that such request seeks to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such a request is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. BellSouth has interpreted FCCA's request 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.

3. BellSouth objects to the request and instruction to the extent that such request or instruction calls for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. BellSouth objects to the request insofar as the request is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of this

request. Any responses provided by BellSouth in response to FCCA's request will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth objects to the request insofar as the request is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. BellSouth will attempt to note in its responses each instance where this objection applies.

6. BellSouth objects to FCCA's discovery request, instructions and definitions, insofar as they seek to impose obligations on BellSouth that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

7. BellSouth objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission, or elsewhere.

8. BellSouth objects to the request, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. BellSouth objects to the request to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that FCCA requests proprietary confidential business information which is not subject to the "trade secrets" privilege, BellSouth will make such information available to counsel for FCCA pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

10. 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 will be provided in response to this discovery request. Rather, BellSouth's responses will provide, subject to any applicable objections, all of the information obtained by BellSouth after a reasonable and diligent search conducted in connection with this request. BellSouth shall conduct 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. To the extent that FCCA requests herein documents that have previously been produced to other parties in response to previous discovery, then without limiting any of the foregoing objections, BellSouth incorporates herein by reference its objections to that previous discovery.

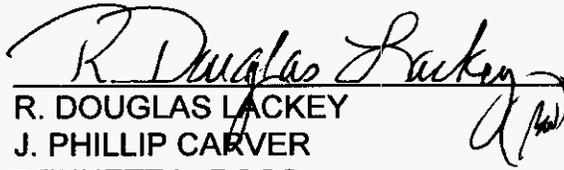
Respectfully submitted this 15th day of May, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.



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212751

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

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

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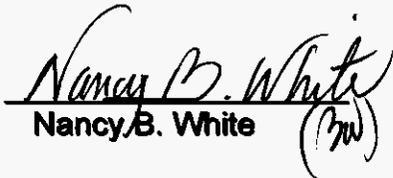
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**(+) Signed Protective Agreement**