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REPORTING

November 13, 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. 000907-TP (Level 3 Arbitration)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Objections to Level 3 Communications, LLC's First Set of Interrogatories, and First Request for Production of Documents, 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,

T. Michael Twomey
T. Michael Twomey

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

CMP
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SEC-1

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CERTIFICATE OF SERVICE
Docket No. 000907-TP

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

U. S. Mail and Facsimile* this 13th day of November, 2000 to the following:

C. Lee Fordham
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
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Ms. Felicia R. Banks*
Division of Legal Services
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T. Michael Twomey

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

ORIGINAL

In re:)
) Docket No. 000907-TP
Petition by Level 3 Communications, LLC for)
Arbitration of Certain Terms and Conditions of a Proposed)
Agreement with BellSouth Telecommunications, Inc.) Filed: November 13, 2000
)

**BELLSOUTH TELECOMMUNICATIONS, INC.'S OBJECTIONS
TO LEVEL 3 COMMUNICATIONS, LLC'S 1ST SET OF INTERROGATORIES AND 1ST
REQUEST FOR PRODUCTION OF DOCUMENTS**

BellSouth Telecommunications, Inc. ("BellSouth") files its objections to Level 3 Communications, LLC's 1st Set of Interrogatories and 1st Request for Production of Documents as follows:

GENERAL OBJECTIONS

1. BellSouth objects to the definitions and instructions to the extent they seek to impose any obligation upon BellSouth which exceeds the obligations established by the rules of civil procedure or by the Commission.
2. BellSouth objects to the definition of "BellSouth" as overly broad. BellSouth will respond to these requests on behalf of those entities for whom BellSouth is legally required to respond.
3. BellSouth objects to the interrogatories and requests for production to the extent they seek information or documents protected from disclosure by the attorney-client or work product privileges. In particular, BellSouth objects to those interrogatories which request BellSouth's legal analysis of particular issues. Such requests seek the disclosure of attorney work product.

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4. BellSouth objects to the interrogatories and requests for production to the extent they seek information or documents relating to BellSouth's operations outside of Florida, including specifically any requests that seek information or documents concerning interconnection agreements between BellSouth and competing providers in states other than Florida.

SPECIFIC OBJECTIONS

I. Interrogatories

Interrogatory No. 1: For each person that has submitted, or will submit, testimony on your behalf in this proceeding, please (a) identify each person who may support such witness in preparing testimony and (b) separately for each such person, state generally the facts about which that person has knowledge.

Objection: BellSouth objects to this request as being overly broad except to the extent that it seeks the identity of BellSouth's witnesses who will testify in this proceeding. In preparing testimony, BellSouth's witnesses rely on a variety of subject matter experts, attorneys and general support personnel, the identification of whom is not relevant to any of the issues raised in this proceeding.

Interrogatory No. 5: Please provide a technical description of how FX is provided to customers, including diagrams and descriptions of ancillary features (e.g., collocation of customer equipment).

Objection: BellSouth objects to this request on the grounds that it is overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. However, in an attempt to be responsive, BellSouth will produce illustrative diagrams of the most common FX configuration with its responses to these data requests.

Interrogatory No. 9: Please identify the number of customers in Florida who subscribe to or purchase BellSouth's FX service.

Objection: BellSouth objects to this request on the grounds that it seeks information which is not relevant to the issues in this proceeding. Moreover, the information is highly confidential and proprietary.

Interrogatory No. 11: Please identify the number of customers in Florida who subscribe to or

purchase the FX-Like Services identified in response to Interrogatory No. 4.

Objection: BellSouth objects to this request on the grounds that it seeks information which is not relevant to the issues in this proceeding. Moreover, the information is highly confidential and proprietary.

Interrogatory No. 15: If the answer to Interrogatory No. 14 is in the affirmative, please explain the factual and legal basis for your contention and provide citations to any authority or copies of any unreported decisions upon which BellSouth relies to support the legal basis for this position.

Objection: BellSouth objects to this request to the extent it seeks a legal analysis of the issue in dispute. Such legal analysis is not a proper subject for discovery.

Interrogatory No. 17: If the answer to Interrogatory No. 16 is in the affirmative, please explain the factual and legal basis for your contention and provide citations to any authority upon which BellSouth relies to support the legal basis for this position.

Objection: BellSouth objects to this request to the extent it seeks a legal analysis of the issue in dispute. Such legal analysis is not a proper subject for discovery.

Interrogatory No. 30: Please state whether BellSouth believes the charges identified in response to Interrogatory Nos. 24 and 27 comply with a Total Element Long Run Incremental Cost methodology adopted by the Federal Communications Commission and/or the Commission. If the answer is yes, please provide a detailed explanation of your reasoning and provide all documentation supporting your assertion.

Objection: BellSouth objects to this request to the extent it seeks a legal analysis of the issue in dispute. Such legal analysis is not a proper subject for discovery.

Interrogatory No. 31: Please state whether BellSouth believes the charges identified in response to Interrogatory Nos. 24 and 27 comply with the pricing standards of section 252(d) of the Act. If the answer is yes, please provide a detailed explanation of your reasoning.

Objection: BellSouth objects to this request to the extent it seeks a legal analysis of the issue in dispute. Such legal analysis is not a proper subject for discovery.

Interrogatory No. 55: If the answer to the preceding DR is in the affirmative, please provide: (a) citations to any authority or copies of any unreported decisions upon which BellSouth relies to support the legal basis for this position and, (b) any documents upon which BellSouth relies to support the factual basis for this position.

Objection: BellSouth objects to this request to the extent it seeks a legal analysis of the issue in dispute. Such legal analysis is not a proper subject for discovery.

Interrogatory No. 57: If the answer to Interrogatory No. 56 is in the negative, please provide citations to any authority upon which BellSouth relies to support the legal basis for this position.

Objection: BellSouth objects to this request to the extent it seeks a legal analysis of the issue in dispute. Such legal analysis is not a proper subject for discovery.

II. Requests For Production

Request No. 9: If your answer to Interrogatory No. 14 is in the affirmative, please provide (a) copies of any unreported decisions upon which BellSouth relies to support the legal basis and (b) any documents upon which BellSouth relies to support the factual basis for this position.

Objection: BellSouth objects to this request to the extent it seeks a legal analysis of the issue in dispute. Such legal analysis is not a proper subject for discovery. Moreover, any court or commission decisions relating to this issue are equally available to Level 3.

Request No. 10: If your answer to Interrogatory No. 16 is in the affirmative, please provide (a) copies of any unreported decisions upon which BellSouth relies to support the legal basis for this position and, (b) any documents upon which BellSouth relies to support the legal basis for this position and, (b) any documents upon which BellSouth relies to support the factual basis for this position.

Objection: BellSouth objects to this request to the extent it seeks a legal analysis of the issue in dispute. Such legal analysis is not a proper subject for discovery. Moreover, any court or commission decisions relating to this issue are equally available to Level 3.

Request No. 24: If the answer to Interrogatory No. 54 is in the affirmative, please provide (a) copies of any unreported decisions upon which BellSouth relies to support the legal basis for this position and (b) any documents upon which BellSouth relies to support the factual basis for this position.

Objection: BellSouth objects to this request to the extent it seeks a legal analysis of the issue in dispute. Such legal analysis is not a proper subject for discovery. Moreover, any court or commission decisions relating to this issue are equally available to Level 3.

Request No. 25: If the answer to Interrogatory No. 56 is in the negative, please provide (a) copies of any unreported decisions upon which BellSouth relies to support the legal basis for this position and (b) any documents upon which BellSouth relies to support the factual basis for this position.

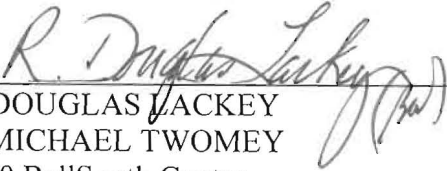
Objection: BellSouth objects to this request to the extent it seeks a legal analysis of the issue in dispute. Such legal analysis is not a proper subject for discovery. Moreover, any court or commission decisions relating to this issue are equally available to Level 3.

Respectfully submitted this 13th day of November, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.



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