

ORIGINAL
BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

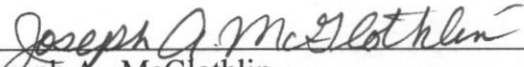
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RECORDS AND
REPORTING

In re: Investigation into appropriate methods
to compensate carriers for exchange of
traffic subject to Section 251 of the
Telecommunications Act of 1996.

Docket No.: 000075-TP
Filed: February 12, 2001

**FCCA'S OBJECTIONS TO
BELLSOUTH'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

General Objections. FCCA objects to the instructions contained in BellSouth's First Request for Production of Documents, to the extent the instructions purport to impose obligations greater than those associated with the applicable rules of discovery. Specifically, FCCA objects to the attempt of BellSouth to characterize the request as "continuing in nature." In addition, while FCCA is an industry association and as an entity does not own facilities or serve end users, FCCA notes that many of the requests for production are objectionable because they seek carrier-specific details which would be irrelevant to the resolution of the policy issues being addressed in this docket.



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APP _____
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SEC I _____
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OTH _____

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of FCCA's Objections to BellSouth's First Request for Production of Documents has been furnished this 12th day of February, 2001 to the following:

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