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June 21, 2001

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: 960786-TL (Section 271)

Dear Ms. Bayó:

Enclosed please find the original and fifteen copies of BellSouth Telecommunications, Inc.'s Objections to Florida Competitive Carriers's Association's Second Request for Production of Documents which we ask that you file in the above-referenced 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 by Federal Express as shown on the attached Certificate of Service.

Sincerely,


Lisa S. Foshee (KA)

Enclosures

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

395517

DOCUMENT NUMBER-DATE

07735 JUN 21 01

FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE
DOCKET NO. 960786-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express and Hand Delivery(*) this 21st day of June, 2001 to the following:

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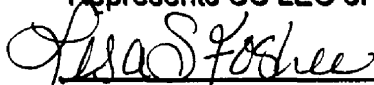
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Lisa S. Foshee (KA)

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of)	
BellSouth Telecommunications, Inc.'s)	
Entry Into InterLATA)	Docket No. 960786-TL
Services Pursuant to Section 271)	
Of the Federal Telecommunications Act)	Filed: June 21, 2001
Of Act of 1996.)	
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**BELLSOUTH TELECOMMUNICATIONS, INC.'S OBJECTIONS TO
FLORIDA COMPETITIVE CARRIER'S ASSOCIATION'S
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS**

BellSouth Telecommunications, Inc., ("BellSouth") hereby makes the following objections to Florida Competitive Carrier's Association's ("FCCA") Second Set of Request for Production of Documents, dated May 31, 2001, and says:

GENERAL OBJECTIONS

1. BellSouth objects to the Request for Production of Documents to the extent they seek 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 request is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.
2. BellSouth objects to each and every request, and instruction to the extent that such request or instruction calls for information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.
3. BellSouth objects to each and every request insofar as they are vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of such Request for Production of Documents. Any

answers provided by BellSouth in response to these Request for Production of Documents will be provided subject to, and without waiver of, the foregoing objection.

4. BellSouth objects to each and every request insofar as the requests are not reasonably calculated to lead to the discovery of admissible evidence and are not relevant to the subject matter of this action.

5. BellSouth objects to providing information to the extent that such information is already in the public record before the Commission.

6. BellSouth objects to each and every request to the extent that the information requested constitutes “trade secrets” which are privileged pursuant to §90.506, *Florida Statutes*. BellSouth also objects to each and every request that would require the disclosure of customer specific information, the disclosure of which is prohibited by §364.24, *Florida Statutes*. BellSouth also objects to the disclosure of confidential business information. To the extent that FCCA requests confidential business information that 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 objections contained herein.

7. BellSouth objects to FCCA’s Request for Production of Documents, 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.

8. BellSouth objects to each and every request insofar as any of them is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. 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 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 has been identified in response to these Requests for Production of Documents. BellSouth will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the Request for Production of Documents purports to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

BellSouth has made herein the objections it has noted thusfar. BellSouth specifically reserves the right to make additional objections as it continues to review the requests and its responses thereto.

SPECIFIC OBJECTIONS

1. BellSouth specifically objects to Request No. 1 on the grounds that the document sought is not relevant to the issue of BellSouth's compliance with the competitive checklist set forth in Section 271 of the Telecommunications Act of 1996. Section 271 addresses certain specific obligations with which BellSouth must comply to be granted entry into the long distance market; BellSouth's conduct regarding winbacks is not relevant to an assessment of BellSouth's compliance with those obligations. In addition, the document sought is proprietary and can be only be produced subject to protective agreement.

2. BellSouth objects to this Request on the grounds that pursuant to Order No. PSC-01-1033-PCO-TL, issued April 27, 2001, BellSouth may only produce CLEC-specific data of a party to the proceeding to counsel of record for that party and to Staff. Non-party ALEC information can only be disseminated in the aggregate. BellSouth cannot respond to this Request

until such time as FCCA provides BellSouth with a list of the members of the organization and indicates whether all such members are parties to the case.

3. BellSouth specifically objects to Request No. 8 on the grounds that it is vague, overbroad and lacks sufficient specificity to allow BellSouth to answer. Subject to and without waiving these objections, BellSouth will endeavor to respond to the Request.

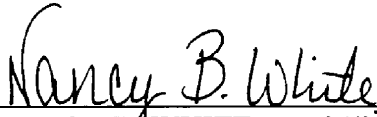
4. BellSouth specifically objects to Request No. 9 on the grounds that it is vague, overbroad and lacks sufficient specificity to allow BellSouth to answer. Subject to and without waiving these objections, BellSouth will endeavor to respond to the Request.

5. BellSouth specifically objects to Request No. 10 on the grounds that the information sought is not relevant and is not likely to lead to the discovery of admissible evidence in this proceeding.

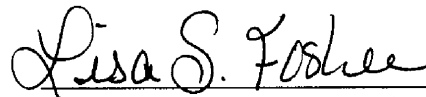
WHEREFORE, BellSouth respectfully requests that the Commission sustain each of the objections set forth herein.

Respectfully submitted this 21st day of June 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.



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