

ORIGINAL

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October 27, 1997

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

RE: Docket Nos. 970172-TP and 970281-TL

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response and Objections to Florida Public Telecommunications Association's First Request for Production of Documents and Motion for Protective Order. 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,

Nancy B. White
Nancy B. White

- ACK _____
- AFA 2
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG 2
- LIN 5
- OPC _____
- RON _____
- SEC 1
- WAS _____
- OTH _____

Enclosures

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
W. J. Ellenberg

DOCUMENT NUMBER-DATE
11088 OCT 27 97
FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by MCI)
 Telecommunications Corporation)
 for an order requiring BellSouth)
 Telecommunications, Inc. to remove)
 its deregulated payphone investment) Docket No. 970172-TP
 and associated expenses from its)
 intrastate operations and reduce)
 the Carrier Common Line rate)
 element of its intrastate switched)
 access charges by approximately)
 \$36.5 million as required by the)
 Federal Telecommunications Act)
 of 1996.)
 _____)

In re: Establishment of)
 intrastate implementation)
 requirement governing) Docket No. 970281-TL
 federally mandated)
 deregulation of local)
 exchange company payphones.)
 _____) Filed: October 27, 1997

**BELLSOUTH TELECOMMUNICATIONS, INC.'s RESPONSE
 AND OBJECTION TO FPTA's FIRST REQUEST FOR PRODUCTION
 OF DOCUMENTS AND MOTION FOR PROTECTIVE ORDER**

BellSouth Telecommunications, Inc. ("BellSouth" or
 "Company"), hereby files, pursuant to Rule 25-22.034 and 25-
 22.035, Florida Administrative Code, and Rules 1.340 and
 1.280(b), Florida Rules of Civil Procedure, hereby submits the
 following Response and Objections to Florida Public
 Telecommunications Association's ("FPTA") First Request for
 Production of Documents to BellSouth dated September 23, 1997.

GENERAL RESPONSES

BellSouth makes the following General Responses to FPTA's
 First Request for Production of Documents.

DOCUMENT NUMBER-DATE
 11088 OCT 27 97
 FPSC-RECORDS/REPORTING

1. BellSouth has interpreted FPTA's requests to apply to BellSouth's regulated intrastate operations in Florida and limits its Answers 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 as irrelevant, overly broad, unduly burdensome, and oppressive.

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

MOTION FOR PROTECTIVE ORDER

3. BellSouth objects to each and every 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 FPTA's requests request proprietary confidential business information which is not subject to the "trade secrets" privilege, BellSouth will make such information available to counsel for FPTA pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

RESPONSES TO SPECIFIC RESPONSES

Subject to, and without waiver of, the foregoing general responses, BellSouth enters the following specific responses with respect to FPTA's requests:

4. With respect to Request No. 1, BellSouth will produce responsive documents that are in its possession, custody, or

control at a mutually convenient time and place subject to the
Motion for Temporary Protective Order set forth above.

Respectfully submitted this 27th day of October, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (ps)

ROBERT G. BEATTY

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CERTIFICATE OF SERVICE
DOCKET NO. 970281-TL , 970172-TP and 970173-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U. S. Mail and *Federal Express this 27th day of October, 1997 to the following:

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