

ORIGINAL

Legal Department  
NANCY B. WHITE  
Assistant General Counsel-Florida

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(305) 347-5558

May 11, 1998

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. 920260-TL

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Responses and Objections to Citizen's First Set of Post-Settlement Requests for Production of Documents (1997 Earnings) and Motion for a Temporary Protective Order, which we ask that you file in the captioned matter.

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,

*Nancy B. White (ke)*

Nancy B. White

ACK ✓  
AFA 1  
APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMU 1  
CTR \_\_\_\_\_ Enclosures  
EAG \_\_\_\_\_  
LEG 1  
LIN 5  
OPC \_\_\_\_\_  
RCH \_\_\_\_\_  
SEC 1  
WAS \_\_\_\_\_  
OTH \_\_\_\_\_

cc: All parties of record  
A. M. Lombardo  
R. G. Beatty  
William J. Ellenberg II

RECEIVED & FILED  
*[Signature]*  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

05249 MAY 11 88

FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE**  
**Docket No. 920260-TL**

I HEREBY CERTIFY that a copy of the foregoing has been

furnished by \* Hand-Delivery and U.S. Mail this 11th day of May, 1998 to:

=====

Bob Elias  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Charles J. Beck, Esq. \*  
Jack Shreve, Esq.  
Public Counsel  
Office of the Public Counsel  
c/o The Florida Legislature  
111 West Madison Street  
Room 812  
Tallahassee, FL 32399-1400

Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter, Reeves, McGlothlin,  
Davidson, Rief & Bakas, P.A.  
117 South Gadsden Street  
Tallahassee, FL 32301

Kenneth A. Hoffman  
Rutledge, Ecenia, Underwood,  
Purnell & Hoffman  
Post Office Box 551  
215 South Monroe Street  
Suite 420  
Tallahassee, FL 32301-1841

Michael W. Tye  
Tracy Hatch  
AT&T Communications of the  
Southern States, Inc.  
101 No. Monroe St., Ste. 700  
Tallahassee, Florida 32301

Robin Dunson  
1200 Peachtree Street, N.E.  
Promenade I, Room 4038  
Atlanta, GA 30309

Michael J. Henry  
MCI Telecommunications Corp.  
780 Johnson Ferry Road  
Suite 700  
Atlanta, Georgia 30342

Richard D. Melson  
123 South Calhoun Street  
P.O. Box 6526  
Tallahassee, Florida 32314

Laura L. Wilson, Esq.  
Florida Cable Telecommunications  
Assn., Inc.  
Vice President, Regulatory  
Affairs & Regulatory Counsel  
310 North Monroe Street  
Tallahassee, FL 32301

Benjamin H. Dickens, Jr.  
Blooston, Mordkofsky,  
Jackson & Dickens  
2120 L Street, N.W.  
Washington, DC 20037

Benjamin A. Fincher  
Sprint Communications Co.  
Limited Partnership  
3065 Cumberland Circle  
Atlanta, GA 30339

Mark K. Logan  
Bryant, Miller and Olive, P.A.  
201 South Monroe Street  
Suite 500  
Tallahassee, FL 32301

Mark Richard  
Attorney for CWA  
Locals 3121, 3122, and 3107  
304 Palermo Avenue  
Coral Gables, FL 33134

Mr. Douglas S. Metcalf  
Communications Consultants, Inc.  
631 S. Orlando Ave., Suite 450  
P. O. Box 1148  
Winter Park, FL 32790-1148

Angela Green  
Florida Public  
Telecommunications Assn., Inc.  
125 South Gadsden Street  
Suite 200  
Tallahassee, FL 32301

William H. Higgins, V.P./Law  
AT&T Wireless Services of  
Florida, Inc.  
West Tower, Third Floor  
11760 N. U.S. Highway 1  
North Palm Beach, FL 33408

Marsha E. Rule  
Wiggins & Villacorta, P.A.  
501 East Tennessee Street  
Suite B  
Post Office Drawer 1657  
Tallahassee, Florida 32302

Patrick K. Wiggins  
Wiggins & Villacorta, P.A.  
501 East Tennessee Street  
Suite B  
Post Office Drawer 1657  
Tallahassee, Florida 32302

David Larimer  
Florida Today  
P.O. Box 419000  
Melbourne, FL 32941-9000

Dan Shorter  
Palm Beach Newspapers  
P.O. Box 24700  
W. Palm Beach, FL 33416-4700

Steve Brown  
Intermedia Communications,  
Inc.  
3625 Queen Palm Drive  
Tampa, Florida 33619-1309

Fla. Public Telecomm. Assoc.  
c/o Mr. Lance C. Norris, Pres.  
125 So. Gadsden St., #200  
Tallahassee, FL 32301-1525

C. Everett Boyd, Jr.  
Ervin, Varn, Jacobs & Ervin  
305 South Gadsden Street  
Post Office Drawer 1170  
Tallahassee, Florida 32302

Floyd R. Self, Esq.  
Messer, Caparello, Madsen  
Goldman & Metz  
Post Office Box 1876  
Tallahassee, FL 32302-1876

Nancy B. White (KR)  
Nancy B. White

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of )  
 the Revenue Requirements and Rate) Docket No. 920260-TL  
 Stabilization Plan of Southern )  
 Bell Telephone and Telegraph )  
 Company )  
 \_\_\_\_\_ ) Filed: May 11, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES  
 AND OBJECTIONS TO CITIZENS' FIRST SET OF POST-SETTLEMENT  
 REQUESTS FOR PRODUCTION OF DOCUMENTS (1997 EARNINGS)  
AND MOTION FOR A TEMPORARY PROTECTIVE ORDER**

COMES NOW, BellSouth Telecommunications, Inc. ("BellSouth"), and files pursuant to Rule 25-22.034, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, its Responses and Objections to Citizens' First Set of Post-Settlement Requests for Production of Documents (1997 Earnings) dated April 10, 1998, and pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, its Motion for Temporary Protective Order.

**MOTION FOR TEMPORARY PROTECTIVE ORDER**

Some of the documents that will be delivered to or made available for review by Public Counsel contain proprietary, confidential business information that should not be publicly disclosed. Thus, pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, BellSouth moves the Prehearing Officer to issue a Temporary Protective Order exempting these documents from § 119.07(1), Florida Statutes. These documents contain, among other things, nonregulated operations information, and other proprietary confidential business information. Such information is specifically included as proprietary confidential business

119451

DOCUMENT NUMBER-DATE  
 05249 MAY 11 88  
 FPSC-RECORDS/REPORTING

information pursuant to § 364.183(3)(f), Florida Statutes. If Public Counsel subsequently notifies BellSouth that any of the proprietary documents are to be used in a proceeding before the Commission, BellSouth will, in accordance with Rule 25-22.006, Florida Administrative Code, file a detailed Motion for Protective Order specifically addressing each of the documents identified.

### **GENERAL RESPONSES**

1. BellSouth objects to Public Counsel's proposed "Instruction" relating to details of privileged documents. To the extent a document responsive to any of the requests is subject to an applicable privilege, some of the information requested by Public Counsel would be similarly privileged and therefore not subject to discovery. Notwithstanding this objection, BellSouth agrees to identify any documents withheld on the basis of privilege.

2. With regard to Public Counsel's definition of "document" or "documents", BellSouth has made a diligent, good faith attempt to locate documents responsive to the scope of Public Counsel's individual requests for documents.

3. BellSouth objects to Public Counsel's definition of "you" and "your." It appears that Public Counsel, through its definition of these words, is attempting to obtain discovery of information in the possession, custody, or control of entities that are not parties to this docket. Requests for Production may only be directed to parties, and any attempt by Public Counsel to obtain discovery from non-parties should be prohibited. See Rule 1.340, Florida Rules of Civil Procedure; Broward v. Kerr, 454 So. 2d 1068 (4th D.C.A. 1984). Some

of the information responsive to Citizens' First Set of Post-Settlement Requests for Production of Documents are not in the custody, possession, or control of BellSouth. However, BellSouth Corporation, the parent of BellSouth as a matter of comity, is willing voluntarily to make available appropriate information or make an appropriate reply to those questions. Most of this information is confidential and proprietary and, therefore, to the extent made available, it may be reviewed at a mutually agreeable time and place after the execution of an appropriate protective agreement with BellSouth Corporation.

4. BellSouth does not believe it was Public Counsel's intent to require BellSouth to produce again the same documents previously produced in other dockets, but to the extent it does, BellSouth objects on the basis that such a request would be unduly burdensome, oppressive, and unnecessary, and for these reasons is prohibited.

5. BellSouth objects to the specific time and place designated by Public Counsel for the production of documents for the reasons that the designation is not reasonable, but has no objection to producing the documents that are responsive and to which no other objection is made, at a mutually agreed upon time and place.

6. The following Specific Responses are given subject to the above-stated General Responses and Objections.

## SPECIFIC RESPONSES

1. Please provide all workpapers and back-up documents for each of your Florida intrastate surveillance reports for periods ending after December 31, 1996.

**Response:** 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.

2. Please provide copies of all workpapers and other supporting documentation relating to errors or which quantify errors discovered to date in the 1997 Surveillance Report and all items booked in 1997 that more properly relate to 1996 or 1998.

**Response:** 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..

3. Please provide a copy of all the monthly workpapers where the Federal and State current and deferred income tax is computed for the Florida operations during 1997.

**Response:** BellSouth has no documents in its possession, custody, or control responsive to this request. The information responsive to this request, if any, is in the possession, custody, and control of BellSouth Corporation ("BSC").

4. Please provide copies of all internal memos, notations, notes from phone conversations and any and all other writing wherein the Company discussed each of the following items.



- a. Any attempt to contact vendors or solicit from vendors invoices or billings which represent pre-billings or estimates of work completed through a specific time period such as December 31, 1997 for which such work would normally not be billed until the work was complete.
- b. Any and all attempts to request invoices from vendors or billings from vendors for re-engineering work under way or in process but for which normal billings would not be issued until the work was complete.
- c. Any and all documents which identify the specific amount of re-engineering charges billed in 1997, either through the normal billing process or through advanced billings or process billings.

**Response:** 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.

5. Please provide a copy of the report(s) which shows the detail behind each BSC, BST - Headquarters or any affiliates charges to the Florida operation for 1997. This should be the complete detail for each charge but can be limited to charges which exceed \$5,000.

**Response:** BellSouth objects to this request on the basis that it is overly burdensome and oppressive. In an effort to be responsive, however, BellSouth will provide a list for review by Public Counsel from which Public Counsel may request a representative sample. BellSouth will then provide those requested at a mutually convenient time and place subject to the Motion for Temporary Protective Order set forth above.

6. Please provide a BellSouth Corporation (parent unconsolidated) detailed trial balance by sub-account at December 31, 1997.

**Response:** BellSouth has no documents in its possession, custody, or control responsive to this request. The information responsive to this request, if any, is in the possession, custody, and control of BSC.

7. Please provide copies of all invoices exceeding \$5,000 during the year ended December 31, 1997, in which all or part of the cost was charged to Account 6722 - External Relations.

**Response:** BellSouth objects to this request on the basis that it is overly burdensome and oppressive. In an effort to be responsive, however, BellSouth will provide a list for review by Public Counsel from which Public Counsel may request a representative sample. BellSouth will then provide those requested at a mutually convenient time and place subject to the Motion for Temporary Protective Order set forth above.

8. Please provide copies of all invoices exceeding \$5,000 during the year ended December 31, 1997, which were classified by the Company as sponsorships in which all or portion of the cost was charged to Florida intrastate operations.

**Response:** BellSouth objects to this request on the basis that it is overly burdensome and oppressive. In an effort to be responsive, however, BellSouth will provide a list for review by Public Counsel from which Public Counsel may request a representative sample. BellSouth will then provide those requested at a mutually convenient time and place subject to the Motion for Temporary Protective Order set forth above. BellSouth also refers Public Counsel to the "Other Regulatory Adjustments Section" in its response to Request 1.

9. Please provide all invoices incurred at BellSouth Telecommunications, Inc. (Headquarters) exceeding \$25,000 that were paid or accrued during

the year ended December 31, 1997, in which all or a portion of the expense would have ultimately been charged or allocated to Florida operations.

**Response:** BellSouth objects to this request on the basis that it is overly burdensome and oppressive. In an effort to be responsive, however, BellSouth refers Public Counsel to BellSouth's response to Request 21.

10. Please provide copies of all invoices exceeding \$5,000 in which all or a portion of the cost was charged to EXTC 438 (Voluntary Payments - General Company Benefit) during the year ended December 31, 1997.

**Response:** BellSouth objects to this request on the basis that it is overly burdensome and oppressive. In an effort to be responsive, however, BellSouth will provide a list for review by Public Counsel from which Public Counsel may request a representative sample. BellSouth will then provide those requested at a mutually convenient time and place subject to the Motion for Temporary Protective Order set forth above.

11. Please provide copies of all invoices exceeding \$5,000 in which all or a portion of the cost was charged to EXTC 441 (Voluntary Payments - Specific Organization Benefit) during the year ended December 31, 1997.

**Response:** BellSouth objects to this request on the basis that it is overly burdensome and oppressive. In an effort to be responsive, however, BellSouth will provide a list for review by Public Counsel from which Public Counsel may request a representative sample. BellSouth will then provide those requested at a mutually convenient time and place subject to the Motion for Temporary Protective Order set forth above.

12. Please provide copies of all invoices exceeding \$5,000 in which all or a portion of the cost was charged to EXTC 442 (Voluntary Payments - Stimulation of Business) during the year ended December 31, 1997.

**Response:** 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.

13. Please provide copies of all invoices exceeding \$5,000 during the year ended December 31, 1997, in which all or part of the cost was charged to Account 6728.

**Response:** 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.

14. Please provide copies of all invoices exceeding \$5,000 during the year ended December 31, 1997, in which all or part of the cost was charged to Account 6725 - Legal Fees.

**Response:** 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.

15. Please provide copies of all invoices exceeding \$5,000 during the year ended December 31, 1997, in which all or part of the cost was charged to Account 6711 - Executive.

**Response:** BellSouth objects to this request on the basis that it is overly burdensome and oppressive. In an effort to be responsive, however, BellSouth will provide a list for review by Public Counsel from which Public Counsel may request a representative sample. BellSouth will then provide those requested at

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

16. Please provide a copy of all invoices from AT&T and other Bell Companies associated with pre-divestiture liabilities in which all or portion of the cost was charged to Florida intrastate operations during the year ended December 31, 1997. This should include vouchers paid by the Company, BST, BSC and any other affiliate in which a portion of the charge was ultimately allocated or billed to Florida intrastate operations.

Response: BellSouth has no documents responsive to this request.

17. Please provide a copy of the most recent Financial Code Hierarchies booklet.

**Response:** 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.

18. Please provide copies of all invoices or journal entries exceeding \$5,000 in which all or a portion of the charges were allocated to the EXTCS listed below during the year ended December 31, 1997.

- a. 196 -Termination - Special Payments
- b. 434 - Membership
- c. 438- Subscriptions
- d. 76A - Academia - Fee Payments
- e. 76F - Out Placement Counseling

- f. 853 - Spouses' Expenses
- g. 899 - Other Business Costs
- h. 19A - Retro Wage Adjustment
- l. 401 - Awards and Recognition
- j. 710 - Accident and Damage Payments to Others
- k. 731 - Benefits - Retired and Separated Employees
- l. 762 - Attorneys & Arbitration Fee Payments
- m. 763 - Financial Services - Fee Payments
- n. 769 - Other Fee Payments
- o. 76D - Accounting Firms Other
- p. 851 - Miscellaneous Entertainment Cost

**Response:** BellSouth objects to this request on the basis that it is overly burdensome and oppressive. In an effort to be responsive, however, BellSouth will provide a list for review by Public Counsel from which Public Counsel may request a representative sample. BellSouth will then provide those requested at a mutually convenient time and place subject to the Motion for Temporary Protective Order set forth above.

19. Please provide copies of all year end closing journal entries for the year ended December 31, 1997.

**Response:** 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.

20. Please provide copies of all journal entries recorded by the Company during 1997 where the effect on revenue or expense exceeded \$10,000 and which were other than mechanized recurring journal entries.

**Response:** BellSouth objects to this request on the basis that it is overly burdensome and oppressive. In an effort to be responsive, however, BellSouth will make available a list for review by Public Counsel provided in response to Request 21 from which Public Counsel may request a representative sample. BellSouth will then provide those requested at a mutually convenient time and place subject to the Motion for Temporary Protective Order set forth above.

21. Please provide a special computer print out for the year ended December 31, 1997 for the Company, BellSouth Corporation and BellSouth Telecommunications, Inc. (Headquarters) Such print out should include all charges to any above the line account which exceed \$10,000 and are other than labor. The print out should include adequate reference as to the source, such as: journal entry number/description, vendor, voucher number as well as the dollar amount. The print out can be by account number for the entire period or monthly by account number.

**Response:** BellSouth objects to this request on the basis that it is overly burdensome and oppressive. In an effort to be responsive, however, BellSouth will provide a list for review by Public Counsel from which Public Counsel may request a representative sample. BellSouth will then provide those requested at a mutually convenient time and place subject to the Motion for Temporary Protective Order set forth above.

22. Please provide copies of all BellSouth Corporation invoices which exceeded \$25,000 and were charged to any one of the following accounts for the period December 1, 1994 through November 30, 1997:

- a. 744.6 - GA Dome rent expense
- b. 745.81 - Mktg. advert/ publicity
- c. 745.9 - Advertising Corporate Image
- d. 746.C35 - Contributions
- e. 746.C38 - Professional Services - affiliate sponsorships
- f. 746.61 - Other - fees and other
- g. 746.21 - Consulting - fees & other
- h. 739 - Sponsorships
- i. 756.1 - Contributions
- j. 756.3 - Contributions - Vol. Svcs grants
- k. 756.4 - Const - matching gifts
- l. 772 - Olympic sponsorships
- m. 896 - Unusual or frequent expense

**Response:** BellSouth has no documents in its possession, custody, or control responsive to this request. The information responsive to this request is in the possession, custody, and control of BSC.

23. Please provide copies of all journal entries ( include journal entries for Accounts Payable) recorded during 1997 for re-engineering activities which



exceeded \$10,000 which set up liabilities or payables for amounts to be incurred or paid subsequent to December 31, 1997.

**Response:** BellSouth has no documents responsive to this request.

24. Please provide each document in your possession, custody or control evaluating, analyzing or commenting on your Florida intrastate earnings, either actual or projected, for the calendar year 1997.

**Response:** BellSouth refers Public Counsel to its response to Request 26.

25. Please provide each document in your possession, custody or control evaluating, analyzing or commenting on the possible amount of "sharing" with customers for calendar year 1997.

**Response:** BellSouth refers Public Counsel to its response to Request 26.

26. Please provide each document in your possession, custody or control estimating, discussing or projecting the accrual of sharing amounts during 1997.

**Response:** 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.

27. Please provide the Southern Bell final actuals vs. budget report issued by operations manager-corporate budget office for each month during 1997 and for the first three months of 1998.

**Response:** 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.

28. Please provide each document in your possession, custody or control evaluating, analyzing or commenting on the variance between budgeted and actual financial results of Florida intrastate regulated operations during 1997 and the first three months of 1998.

**Response:** BellSouth has no documents responsive to this request.

29. Please provide the "Florida Results - Actual vs. budget" prepared by Florida Comptrollers staff for each month during 1997 and the first three months of 1998.

**Response:** BellSouth refers the Public Counsel to its response to Request 27.

30. Please provide the BellSouth Headquarters Results for each month during 1997 and the first three months of 1998.

**Response:** BellSouth has no documents in its possession, custody, or control responsive to this request. The information responsive to this request, if any, is in the possession, custody, and control of BSC.

31. Please provide the BellSouth Telecommunications, Inc., income statement, financial summary, supplemental information, expense highlights, and budget deviation explanations for each month during 1997 and the first three months of 1998.

**Response:** BellSouth refers Public Counsel to its response to Request 27.

32. Please provide the Telephone Operations BellSouth Report no. 1 (Explanation of Unusual Fluctuations) and Executives Summaries for each month during 1997 and the first three months of 1998.

**Response:** 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.

33. Please provide the BellSouth and Southern Bell - Florida budget tracking reports for each month during 1997 and the first three months of 1998.

**Response:** BellSouth refers Public Counsel to its response to Request 27.

34. Please provide the Florida Financial Analysis, Florida Operations Council, for each month during 1997 and the first three months of 1998.

**Response:** BellSouth refers Public Counsel to its response to Request 27.

35. Please provide form 10-Q of BellSouth Telecommunications, Inc. and BellSouth Corporation for each quarterly period ended December 31, 1996, or later.

**Response:** 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.

36. Please provide the special accounting transactions letters generally or usually addressed to general managers-comptrollers and operations managers-comptrollers, from operations manager-BST corporate matters, prepared since December 31, 1996.

**Response:** BellSouth refers Public Counsel to its response to Request 37.

37. Please provide each document in your possession, custody or control discussing, commenting on, or evaluating non-recurring expenses or events during 1997.

**Response:** 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.

38. Please provide the general ledger and or detailed trail balance for the year ended December 31, 1997 for the Florida operations.

**Response:** 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.

39. Please provide each document in your possession, custody, or control discussing or disclosing disputed amounts payable for municipal taxes in Florida during 1997.

**Response:** BellSouth has no documents in its possession, custody, or control responsive to this request. The information responsive to this request, if any, is in the possession, custody, and control of BSC.

40. Please provide the report "Details of Florida Revenue Month over Month Fluctuations" for each month of 1997 and for the first three months of 1998.

**Response:** BellSouth will produce the documents responsive to this request at a mutually convenient time and place subject to the Motion for Temporary Protective Order set forth above.

41. Please provide each document in your possession, custody, or control providing details of Florida expense, including month over month fluctuations for each month of 1997 and for the first three months of 1998. Please provide each such document whether called "Details of Florida Expense" or some other name.

**Response:** BellSouth will produce the documents responsive to this request at a mutually convenient time and place subject to the Motion for Temporary Protective Order set forth above and refers Public Counsel to BellSouth's response to Request 37.

42. Please provide the "telops special accounting transactions" report for each month of 1997 and for the first three months of 1998.

**Response:** BellSouth will produce the documents responsive to this request at a mutually convenient time and place subject to the Motion for Temporary Protective Order set forth above and refers Public Counsel to BellSouth's response to Request 37.

43. Please provide all documentation, including vouchers and attachments, related to any legal settlement or judgment costs in excess of \$25,000 accrued during 1997. Please also include the complaint in each such case, as well as any related settlement agreement.

**Response:** 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.

44. Please provide each document in your possession, custody or control related to the gain on sale of Bellcore, including but not limited to all

documents disclosing the total gain, how the gain was allocated among the owners, and the accounting treatment of the gain.

**Response:** 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 11th day of May, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (kk)

ROBERT G. BEATTY  
NANCY B. WHITE  
c/o Nancy Sims  
150 South Monroe Street, #400  
Tallahassee, Florida 32301  
(305) 347-5555

William J. Ellenberg II (kk)

WILLIAM J. ELLENBERG II  
MARY K. KEYER  
675 West Peachtree Street, #4300  
Atlanta, Georgia 30375  
(404) 335-0711