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BellSouth Telecommunications, Inc.
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RECORDS AND
REPORTING

July 21, 1998

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0650

Re: Docket No. 980696-TP (Universal Service - HB4785)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunication's Inc.'s Objections to e.spire's™ First Request for Production of Documents, 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.

RECEIVED & FILED

Sincerely,


FPSC-BUREAU OF RECORDS

Nancy B. White

Nancy B. White (Bo)

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

Enclosures

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

DOCUMENT NUMBER-DATE

07677 JUL 21 98

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

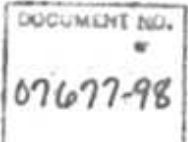
ORIGINAL

In re: Determination of the Cost of Basic) Docket No.: 980696-TP
Local Telecommunications Service, pursuant)
to Section 364.025, Florida Statutes)
_____) Dated: July 21, 1998

**OBJECTIONS OF BELL SOUTH TELECOMMUNICATIONS, INC.
TO e.SPIRE'S™ FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

BellSouth Telecommunications, Inc. ("BellSouth"), by and through its undersigned attorneys, submits its objections to American Communications Services, Inc. - Jacksonville, Inc., d/b/a e.spire™ Communications, Inc. ("e.spire™") First Request for Production of Documents (Nos. 1-2) ("e.spire's™ 1st PODs"), served on July 16, 1998, by U.S. mail, stating as follows:

The objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the five-day requirement set forth in the procedural order issued by the Florida Public Service Commission (the "Commission") (Order No. PSC-98-0813-PCO-TP). The five-day requirement is unprecedented and unduly burdensome. It provides inadequate time to carefully analyze and digest the nature and scope of the discovery requests, especially when the discovery is hand-delivered to BellSouth. Consequently, in order to avoid inadvertent waiver of its objection rights, BellSouth must initially object to all discovery requests. It is not BellSouth's intention by doing so to unduly delay responses to legitimate discovery requests. Should additional grounds for objection be discovered as BellSouth prepares its Answers to this request, BellSouth reserves the right to revise, supplement or modify its objections.



provide e.spire™ with sufficient time to prepare its rebuttal testimony scheduled to be filed on September 2, 1998.

Production of Documents

3. BellSouth objects to e.spire's™ 1st POD, No. 2 on the grounds that these requests are premature, not reasonably calculated to lead to the discovery of admissible evidence, and is not relevant to the subject matter of this action.

Respectfully submitted this 21st day of July, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

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