

ORIGINAL

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September 14, 1998

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RECORDS AND
REPORTING

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. 980696-TP

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Responses and Objections to Staff's Second Request for Production of Documents, which we served today. Please file them 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,

J. Phillip Carver (cc)

J. Phillip Carver

- ACK
- AFA 2
- APP _____
- CAF _____
- CMU King
- CTR _____
- EA _____
- LEG 2
- LIT 5
- OF _____
- RDM _____
- REL 1
- WAS _____
- OTH _____

Enclosures

cc: All parties of record
A. M. Lombardo
R. G. Beatty
William J. Ellenberg II (w/o enclosures)

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14
FISC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
10052 SEP 14 98
FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the Cost)
of Basic Local Telecommunications) Docket No.: 980696-TP
Service, pursuant to Section 364.025,)
Florida Statutes)
_____) Dated: September 14, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES AND
OBJECTIONS TO STAFF'S SECOND REQUEST
FOR PRODUCTION OF DOCUMENTS**

BellSouth Telecommunications, Inc. ("BellSouth"), hereby files pursuant to Rule 25-22.034, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, its Responses and Objections to the Staff of the Florida Public Service Commission's ("Staff") Second Request for Production of Documents dated August 18, 1998.

GENERAL RESPONSE

1. In any instance in which BellSouth agrees to produce documents, they will be produced at a mutually agreeable time and place. In instances in which the documentation is so voluminous that copying or transporting the documents would be burdensome, BellSouth will make the documents available for review upon BellSouth's premises in Atlanta, Georgia.

SPECIFIC RESPONSES

1. In response to Staff's Request to produce Nos. 2, 4, 5, 11, and 13, BellSouth agrees to produce the requested documents at a mutually agreeable

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time and place. The responsive documents are proprietary. Accordingly, BellSouth is filing a Notice of Intent to request confidential classification on this day. BellSouth further responds by noting that information responsive to Request No. 2 was filed as Exhibit GDC-2 to the Direct Testimony of BellSouth witness G. David Cunningham.

2. In response to Staff's Request to Produce Nos. 3, 7, 8, 9, 10, and 12, BellSouth agrees to produce the requested documents at a mutually agreeable time and place. BellSouth also notes that Request No. 10 calls for a narrative explanation. This written explanation will be provided along with the responsive documents.

3. In response to Staff's Request to Produce Nos. 6 and 14, BellSouth states that it has no responsive documents in its possession, custody or control.

Respectfully submitted this 14th day of September, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

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CERTIFICATE OF SERVICE
DOCKET NO. 980698-TP (HB4785)

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express and Hand Delivery* this 14th day of September, 1998 to the following:

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(+) Protective Agreements