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RECORDS AND
REPORTING

October 5, 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. 980696-TP

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Responses and Objections to AT&T's Sixth 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.

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

RECEIVED & FILED
[Signature]
FPSC-BUREAU OF RECORDS

Sincerely,

J. Phillip Carver
(Bo)
J. Phillip Carver

Enclosures

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

DOCUMENT NUMBER-DATE

10922 OCT -5 88

FPSC-RECORDS/REPORTING

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: October 5, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES
AND OBJECTIONS TO AT&T'S SIXTH 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 AT&T Communications of the Southern States, Inc.'s ("AT&T") Sixth Request for Production of Documents dated September 15, 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

DOCUMENT NUMBER-DATE

10922 OCT-5 88

FPCD-RECORDS/REPORTING

1. In response to AT&T's Request to Produce No. 36, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

2. In response to AT&T's Request to Produce No. 37, BellSouth states that the documents responsive to this request contain confidential and proprietary information. Accordingly, BellSouth will produce the documents at a mutually agreeable time and place subject to a Proprietary Agreement executed by AT&T.

3. In response to AT&T's Request to Produce No. 38, BellSouth states that the documents responsive to this request contain confidential and proprietary information. Accordingly, BellSouth will produce the documents at a mutually agreeable time and place subject to a Proprietary Agreement executed by AT&T.

4. In response to AT&T's Request to Produce No. 39, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

5. In response to AT&T's Request to Produce No. 40, BellSouth states that the documents responsive to this request contain confidential and proprietary information. Accordingly, BellSouth will produce the documents at a mutually agreeable time and place subject to a Proprietary Agreement executed by AT&T. Also, BellSouth notes that all documents responsive to this request

are also responsive to Request No. 37 and are being produced in response to that request.

6. In response to AT&T's Request to Produce No. 41, BellSouth states that the documents responsive to this request contain confidential and proprietary information. Accordingly, BellSouth will produce the documents at a mutually agreeable time and place subject to a Proprietary Agreement executed by AT&T. BellSouth notes that one document is being produced in specific response to Request No. 41. BellSouth also notes that all other documents responsive to this request are also responsive to Request No. 37 and are being produced in response to that request.

7. In response to AT&T's Request to Produce No. 42, BellSouth states that the documents responsive to this request contain confidential and proprietary information. Accordingly, BellSouth will produce the documents at a mutually agreeable time and place subject to a Proprietary Agreement executed by AT&T. Also, BellSouth notes that all documents responsive to this request are also responsive to Request No. 37 and are being produced in response to that request.

8. In response to AT&T's Request to Produce No. 43, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

9. In response to AT&T's Request to Produce No. 44, BellSouth states that the documents responsive to this request contain confidential and

proprietary information. Accordingly, BellSouth will produce the documents at a mutually agreeable time and place subject to a Proprietary Agreement executed by AT&T.

10. In response to AT&T's Request to Produce No. 45, BellSouth objects because this request is too vague and ambiguous to allow the framing of a response. Specifically, BellSouth can not determine whether the request calls for information used to conduct the MST analysis, information that supports the modeling assumption that customer locations are evenly distributed along roads, or some other information. BellSouth notes, however, that the methodology by which customer locations are determined for purposes of performing the MST analysis is described in Exhibit BKS-10 to the testimony of Sprint witness, Dr. Brian Staihr.

11. In response to AT&T's Request to Produce No. 46, Exhibit Nos. 8 and 12 to the testimony of Dr. Duffy-Deno are responsive to this request. Also, BellSouth notes that other documents responsive to this request are also responsive to Request No. 37 and are being produced in response to that request.

12. In response to AT&T's Request to Produce No. 47, BellSouth agrees to produce the requested documents at a mutually agreeable time and place. BellSouth notes that all documents responsive to this request are also responsive to Request No. 43, and are being produced in response to that request.

13. In response to AT&T's Request to Produce No. 48, BellSouth agrees to produce the requested documents at a mutually agreeable time and place. BellSouth notes that all documents responsive to this request are also being produced in response to Ncs. 36, 37, and 46. Also, BellSouth states that the documents responsive to this request contain confidential and proprietary information. Accordingly, BellSouth will produce the documents subject to a Proprietary Agreement executed by AT&T.

14. In response to AT&T's Request to Produce No. 49, BellSouth agrees to produce the requested documents at a mutually agreeable time and place. Also, BellSouth notes that all documents responsive to this request are also responsive to Request No. 37 and are being produced in response to that request. Also, BellSouth states that the documents responsive to this request contain confidential and proprietary information. Accordingly, BellSouth will produce the documents subject to a Proprietary Agreement executed by AT&T.

15. In response to AT&T's Request to Produce No. 50, BellSouth agrees to produce the requested documents at a mutually agreeable time and place. BellSouth notes that all documents responsive to this request are also responsive to Request No. 37 and are being produced in response to that request. Also, BellSouth states that the documents responsive to this request contain confidential and proprietary information. Accordingly, BellSouth will produce the documents subject to a Proprietary Agreement executed by AT&T.

16. In response to AT&T's Request to Produce No. 51, BellSouth agrees to produce the requested documents at a mutually agreeable time and place. BellSouth notes that all documents responsive to this request are also responsive to Request No. 37 and are being produced in response to that request. Also, BellSouth states that the documents responsive to this request contain confidential and proprietary information. Accordingly, BellSouth will produce the documents at a mutually agreeable time and place subject to a Proprietary Agreement executed by AT&T.

17. In response to AT&T's Request to Produce No. 52, BellSouth agrees to produce the requested documents at a mutually agreeable time and place. BellSouth notes that all documents responsive to this request are also responsive to Request No. 43, and are being produced in response to that request.

18. In response to AT&T's Request to Produce No. 53, BellSouth states that it has no documents in its possession, custody or control that are responsive to this request.

19. In response to AT&T's Request to Produce No. 54, BellSouth has no responsive documents in its possession, custody or control other than that which is included within the model documentation that has been filed in this docket.

20. In response to AT&T's Request to Produce No. 55, BellSouth objects because the request is too vague and ambiguous to allow the framing of

a response. Specifically, BellSouth can not ascertain the meaning of the phrase "the methodology used to create the address-geocoded locations". For the purpose of the analysis, customers were located in the manner utilized by the HAI Model, which is described in documentation that has been filed in this proceeding by AT&T's witnesses.

21. In response to AT&T's Request to Produce No. 56, BellSouth agrees to produce the requested documents at a mutually agreeable time and place. Also, BellSouth states that these documents responsive to this request are confidential and proprietary information. Accordingly, BellSouth will produce the documents subject to a Proprietary Agreement executed by AT&T. BellSouth further notes that all documents responsive to this request are also responsive to Request No. 37 and are being produced in response to that request.

22. In response to AT&T's Request to Produce No. 57, BellSouth agrees to produce the requested documents at a mutually agreeable time and place. Also, BellSouth states that these documents responsive to this request are confidential and proprietary information. Accordingly, BellSouth will produce the documents subject to a Proprietary Agreement executed by AT&T.

Respectfully submitted this 5th day of October, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.



ROBERT G. BEATTY

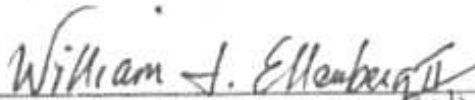
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**CERTIFICATE OF SERVICE
DOCKET NO. 980696-TP (HB4785)**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express and *Hand Delivery this 5th day of October, 1998 to the following:

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(+) Protective Agreements