

RECEIVED FPSC

Legal Department

J. PHILLIP CARVER
General Attorney

98 OCT -5 PM 4:54

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0710

RECORDS AND
REPORTING

October 5, 1998

Mrs. Bianca 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 Fourth (Third) 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 _____

Enclosures

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

Sincerely,

J. Phillip Carver

J. Phillip Carver (for)

DOCUMENT NUMBER-DATE

10928 OCT-5 98

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 STAFF'S FOURTH (THIRD) 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") Fourth¹ Request for Production of Documents (Nos. 52-55) dated September 14, 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.

¹ This request was labeled Staff's "Third". However, a third set of production requests has already been propounded by Staff.

DOCUMENT NUMBER-DATE
10928 OCT-5 98
FPSC-RECORDS/REPORTING

SPECIFIC RESPONSES

1. In response to Staff's Request to produce No. 52, BellSouth agrees to produce the requested documents at a mutually agreeable time and place. The responsive documents are proprietary. Accordingly, BellSouth is filing a Notice of Intent to request confidential classification on this day.

2. In response to Staff's Request to Produce No. 53, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

3. In response to Staff's Request to Produce No. 54, BellSouth states that it has no responsive documents in its possession, control or custody. Please see BellSouth's answer to Interrogatory No. 77 for a description of the process used to determine BellSouth's average drop length for aerial and buried cable.

4. In response to Staff's Request to produce No. 55, BellSouth agrees to produce the requested documents at a mutually agreeable time and place. The responsive documents are proprietary. Accordingly, BellSouth is filing a Notice of Intent to request confidential classification on this day.

Respectfully submitted this 5th day of October, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (w)

ROBERT G. BEATTY
NANCY B. WHITE
c/o Nancy H. Sims
150 So. Monroe Street, Suite 400
Tallahassee, FL 32301
(305) 347-5555

William J. Ellenberg II (w)

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

136039

**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:

Jack Shreve, Esquire
Charles Beck, Esquire
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street, Rm. 812
Tallahassee, Florida 32399-1400
Tel. No. (850) 488-9330
Fax. No. (850) 488-4491

Michael Gross, Esquire (+)
Assistant Attorney General
Office of the Attorney General
PL-0 1 The Capitol
Tallahassee, Florida 32399-1050
Tel. No. (850) 414-3300
Fax. No. (850) 488-6589

Hand Deliveries:
The Collins Building
107 West Gaines Street
Tallahassee, FL 32301

Tracy Hatch, Esquire (+)
AT&T
101 N. Monroe Street, Suite 700
Tallahassee, Florida 32301
Tel. No. (850) 425-6364
Fax. No. (850) 425-6361

Richard D. Nelson, Esquire
Hopping, Green, Sams & Smith, P.A.
123 South Calhoun Street
Tallahassee, Florida 32314
Tel. No. (850) 425-2313
Fax. No. (850) 224-8551
Atty. for MCI

Thomas K. Bond
MCI Metro Access Transmission
Services, Inc.
780 Johnson Ferry Road
Suite 700
Atlanta, GA 30342
Tel. No. (404) 267-6315
Fax. No. (404) 267-5992

Robert M. Post, Jr.
ITS
16001 S.W. Market Street
Indiantown, FL 34956
Tel. No. (561) 597-3113
Fax. No. (561) 597-2115

Charles Rehwinkel
Sprint-Florida, Inc.
1313 Blair Stone Road,
MC FLTHOO 107
Tallahassee, Florida 32301
Tel. No. (850) 847-0244
Fax. No. (850) 878-0777

Carolyn Marek
VP-Regulatory Affairs
S.E. Region
Time Warner Comm.
2828 Old Hickory Boulevard
Apt. 713
Nashville, TN 37221
Tel. No. (615) 673-1191
Fax. No. (615) 673-1192

Norman H. Horton, Jr., Esquire (+)

Messer, Caparello & Self P. A.
215 South Monroe Street
Suite 701
Tallahassee, Florida 32301
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Represents e.spire™

David B. Erwin, Esquire

Attorney-at-Law
127 Riversink Road
Crawfordville, Florida 32327
Tel. No. (850) 926-9331
Fax. No. (850) 926-8448
Represents GTC, Frontier,
ITS and TDS

Floyd R. Self, Esquire

Messer, Caparello & Self, P.A.
215 South Monroe Street
Suite 701
Tallahassee, FL 32301
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Represents WorldCom

Kimberly Caswell, Esquire

GTE Florida Incorporated
201 North Franklin Street
16th Floor
Tampa, Florida 33602
Tel. No. (813) 483-2617
Fax. No. (813) 204-8870

Jeffrey J. Wahlen, Esquire

Ausley & McMullen
227 South Calhoun Street
Tallahassee, Florida 32301
Tel. No. (850) 425-5471 or 5487
Fax. No. (850) 222-7560
Represents ALLTEL, NEFTC,
and Vista-United

Tom McCabe

TDS Telecom
107 West Franklin Street
Quincy, FL 32351
Tel. No. (850) 875-5207
Fax. No. (850) 875-5225

Peter M. Dunbar, Esquire

Barbara D. Auger, Esquire
Pennington, Moore, Wilkinson,
& Dunbar, P. A.
215 South Monroe Street
2nd Floor
Tallahassee, Florida 32301
Tel. No. (850) 222-3533
Fax. No. (850) 222-2126

Brian Sulmonetti

WorldCom, Inc.
1515 South Federal Highway
Suite 400
Boca Raton, FL 33432
Tel. No. (561) 750-2940
Fax. No. (561) 750-2629

Kelly Goodnight

Frontier Communications
180 South Clinton Avenue
Rochester, New York 14646
Tel. No. (716) 777-7793
Fax. No. (716) 325-1355

Laura Gallagher (+)

VP-Regulatory Affairs
Florida Cable Telecommunications
Association, Inc.
310 N. Monroe Street
Tallahassee, Florida 32301
Tel. No. (850) 681-1990
Fax. No. (850) 681-9676

Mark Ellmer

GTC Inc.
502 Fifth Street
Port St. Joe, Florida 32456
Tel. No. (850) 229-7235
Fax. No. (850) 229-8689

Harriet Eudy
ALLTEL Florida, Inc.
206 White Avenue
Live Oak, Florida 32060
Tel. No. (904) 364-2517
Fax. No. (904) 364-2474

Lynne G. Brewer
Northeast Florida Telephone Co.
130 North 4th Street
Macclenny, Florida 32063
Tel. No. (904) 259-0839
Fax. No. (904) 259-7722

James C. Falvey, Esquire
e.spire™ Comm. Inc.
133 National Business Pkwy.
Suite 200
Annapolis Junction, MD 20701
Tel. No. (301) 361-4298
Fax. No. (301) 361-4277

Lynn B. Hall
Vista-United Telecomm.
3100 Bonnet Creek Road
Lake Buena Vista, FL 32830
Tel. No. (407) 827-2210
Fax. No. (407) 827-2424

William Cox *
Staff Counsel
Florida Public Svc. Comm.
2540 Shurnard Oak Blvd.
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6204
Fax. No. (850) 413-6250

Suzanne F. Summerlin, Esq.
1311-B Paul Russell Road
Suite 201
Tallahassee, FL 32301
Tel. No. (850) 656-2288
Fax. No. (850) 656-5589

Paul Kouroupas
Michael McRae, Esq.
Teleport Comm. Group, Inc.
2 Lafayette Centre
1133 Twenty-First Street, N.W.
Suite 400
Washington, D.C. 20036
Tel. No. (202) 739-0032
Fax. No. (202) 739-0044

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas, P.A.
117 South Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 222-2525

Charles Murphy
Booter Imhof
Utilities and Comm. Committee
428 House Office Building
402 South Monroe Street
Tallahassee, FL 32399-1300


J. Phillip Carver (fp)

(+) Protective Agreements