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Legal Department

MARY K. KEYER
General Attorney

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BellSouth Telecommunications, Inc.
150 South Monroe Street
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Tallahassee, Florida 32301
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RECORDS AND
REPORTING

October 30, 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. 980733-TL

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Responses and Objections to the Attorney General's Seventh Request for Production of Documents, which we served via Federal Express on October 29, 1998. 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,

RECEIVED & FILED

FPSC BUREAU OF RECORDS

Mary K. Keyer
Mary K. Keyer

Enclosures

cc: All parties of record

A. M. Lombardo

R. G. Beatty

William J. Ellenberg II (w/o enclosures)

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

DOCUMENT NUMBER-DATE

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FPSC RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Discovery for Study on Fair & Reasonable Rates and on Relationships Among Costs and Charges Associated with Certain Telecommunications Services Provided by LECs, as Required by Chapter 98-277.

Docket No.: 980733-TL

Filed: October 30, 1998

BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES AND OBJECTIONS TO ATTORNEY GENERAL'S SEVENTH REQUEST FOR PRODUCTION OF DOCUMENTS

BellSouth Telecommunications, Inc. ("BellSouth"), 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 Attorney General's ("Attorney General") Seventh Request for Production of Documents dated September 30, 1998.

GENERAL RESPONSES

1. BellSouth objects to the Attorney General'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 the Attorney General 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 the Attorney General's definition of "document" or "documents", BellSouth has made a diligent, good faith attempt to locate

documents responsive to the scope of the Attorney General's individual requests for documents.

3. BellSouth objects to the Attorney General's definition of "you" and "your." It appears that the Attorney General, 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 the Attorney General 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).

4. BellSouth does not believe it was the Attorney General'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.

SPECIFIC RESPONSES

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

35. Please produce the document which shows the most recent FCC approved depreciation rates which apply to your Company in the State of Florida. The documents provided should be the standard summaries which includes, but is not necessarily limited to, the following information: account balances.

depreciation rates, and factors adopted. The table showing the "whole life" lives and related information should also be provided.

Response: BellSouth will provide the requested document.

36. Please provide the document which shows the current recurring two-wire analog port charge is in the interconnection agreement under which BellSouth offers services to MCI Telecommunications Corporation (and/or MCI MetroAccess Transmission Services, Inc., or their successors).

- a. Please provide the document which shows the recurring two-wire analog port charge which your company charges in the most recent interconnection agreement.

Response: BellSouth will produce the requested documents.

37. Attachment 2 of 7, page 6 of 8, to BellSouth's response to Division of Communications' First Data Request, Item 1(e) shows the recurring cost of an ESSX on several lines under the USOC EXMNX. Please provide the workpapers showing the breakdown of each of these costs between the port cost (NTS COE) and the outside plant and circuit equipment costs.

Response: BellSouth has no documents responsive to this request. These USOCs do not contain any port costs. They only include costs that are access-line related, that is, outside plant and circuit equipment costs.

38. Please provide the documents which show the breakdown of the unit costs for each of the USOCs of MultiServ that include the port cost. This breakdown should identify the USOC, should show the port cost, and should


also show the cost for the items (other than port) that are included in that same USOC.

Response: The MultiServ cost study does not itemize the costs associated with USOCs by cost component (loop, port, etc.). However, it does itemize the associated investment by component. Attachment No. 1 (workpapers INVESTDEV, Page 1 of 2) reflects the investment breakdown by central office switch type (DMS100 and 5ESS). The USOC that contains the port cost is M1MDA. In the workpapers under USOC M1MDA, the port is referred to as "Minimum Line Inv (NTS)".

Attachment No. 1 constitutes proprietary confidential business information and will be provided subject to the execution of the appropriate nondisclosure agreement.

Respectfully submitted this 30th day of October, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.


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CERTIFICATE OF SERVICE
Docket No. 980733-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express this 29th day of October, 1998, to the following:

Michael A. Gross
Assistant General Attorney
Office of the Attorney General
PL-01 The Capitol
Tallahassee, FL 32399-1050



Mary K. Keyer