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Legal Department

MARY K. KEYER
General Attorney

93 JUN 15 PM 4:29

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0729

RECORDS AND
REPORTING

January 15, 1999

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. 981052-TP

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Responses and Objections to TCCF'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,

Mary K. Keyer (ke)
Mary K. Keyer

- CK _____
- FA _____
- PP _____
- AF _____
- MU Stav _____
- TR _____
- AG _____
- EG 2 _____
- IN 3 _____
- PC _____
- CH _____
- EC 1 _____
- /AS _____
- ITW _____

Enclosures

cc: All parties of record
M. M. Criser, III
N. B. White
William J. Ellenberg II (w/o enclosures)

RECEIVED & FILED
[Signature]
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

~~981052~~ JAN 15 99

FPSC-BUREAU OF RECORDS

CERTIFICATE OF SERVICE
Docket No. 981052-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via U.S. Mail this 15th day of January, 1999, to the following:

Andrea K. Welch
Telephone Company of Central
Florida, Inc.
3599 W. Lake Mary Boulevard
Suite E
Lake Mary, Florida 32746
(407) 328-5002

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman,
Arnold & Steen, P.A.
117 South Gadsden Street
Tallahassee, FL 32301
(850) 222-2525
Attys. for TCCF

Mary R. Keyer (KR)
Mary R. Keyer

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition by Telephone Company)
of Central Florida, Inc. for resolution of) Docket No. 981052-TP
Items under dispute in resale agreement)
with BellSouth Telecommunications, Inc.) Filed: January 15, 1999

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES
AND OBJECTIONS TO TCCF'S SECOND
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 Telephone Company of Central Florida's ("TCCF") Second Request for Production of Documents dated December 29, 1998.

GENERAL RESPONSES

1. BellSouth incorporates by reference its objections to the Florida Public Service Commission Staff in its First Expedited Request for Production of Documents (Nos. 1-10) filed on December 23, 1998, as if fully set forth herein.

2. BellSouth objects to TCCF'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 TCCF 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.

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

SPECIFIC RESPONSES

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

10. Produce all documents requested by the Florida Public Service Commission Staff in its First Expedited Request for Production of Documents (Nos. 1-10) filed on December 23, 1998.

Response: BellSouth will produce the requested documents, some of which are proprietary, subject to the execution of a Protective Agreement.

Respectfully submitted this 15th day of January, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

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c/o Nancy H. Sims
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