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Legal Department

J. PHILLIP CARVER
General Attorney

20 JUN 24 PM 4:31

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

RECORDS AND
REPORTING

June 24, 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. 990149-TP

Dear Ms. Bayó:

Enclosed are an original and 15 copies of BellSouth Telecommunications, Inc.'s Responses and Objections to Staff's Second Request for Production of Documents. Please file this document 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.

Sincerely,

J. Phillip Carver (cc)

J. Phillip Carver

- AFA _____
- APP _____
- CAF _____
- CMU King Enclosures
- CTR _____
- EAG _____
- LEG _____
- MAS 2
- CPC _____
- RRR _____
- REC 1
- WAW _____
- OTH _____

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

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE



FPSC-BUREAU OF RECORDS

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by MediaOne Florida)	
Telecommunications, Inc. for)	
Arbitration of an interconnection)	Docket No. 990149-TP
Agreement with BellSouth)	
Telecommunications, Inc. pursuant)	
to Section 252(b) of the)	Filed: June 24, 1999
Telecommunications Act of 1996)	
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BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES AND OBJECTIONS TO STAFF'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 Staff of the Florida Public Service Commission's ("Staff") Second Request for Production of Documents dated May 20, 1999.

GENERAL RESPONSES

1. With regard to Staff's definition of "document", BellSouth has made a diligent, good faith attempt to locate documents responsive to the scope of Staff's individual requests for documents.

2. BellSouth objects to Staff's definition of "BellSouth," "you" and "your." It appears that Staff, 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 Staff 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).

3. BellSouth does not believe it was Staff'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.

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

SPECIFIC RESPONSES

5. With respect to Request No. 5, BellSouth will produce the requested documents at a mutually agreeable time and place.

6. With respect to Request No. 6, BellSouth agrees to produce the requested documents at a mutually agreeable time and place. The responsive documents, however, are proprietary. Accordingly, BellSouth is filing a Notice of Intent to request confidential classification on this day.

7. With respect to Request No. 7, BellSouth will produce the requested documents at a mutually agreeable time and place.

8. With respect to Request No. 8, BellSouth will produce the requested documents at a mutually agreeable time and place.

Respectfully submitted this 24th day of June, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White (CR)
NANCY B. WHITE
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**CERTIFICATE OF SERVICE
Docket No. 990149-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U.S. Mail this 24th day of June, 1999 to the following:

Beth Keating, Esq.
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