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Legal Department

J. PHILLIP CARVER
General Attorney

99 JUL -2 PM 4:00

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

RECORDS AND
REPORTING

July 2, 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 Third 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 (KR)

J. Phillip Carver

Enclosures

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[Signature]
FPSC BUREAU OF RECORDS

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

- AFA _____
- APP _____
- CAL _____
- CEN *[initials]*
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- EAG _____
- LEG *[initials]*
- MAP *3*
- OPR _____
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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 2nd day of July, 1999 to the following:

Lee Fordham, Esq.
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

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J. Phillip Carver

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: July 2, 1999
Telecommunications Act of 1996)
_____)

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES
AND OBJECTIONS TO STAFF'S THIRD 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") Third Request for Production of Documents dated June 2, 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

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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. In response to Request to Produce No. 9, BellSouth states that there are no responsive documents because this Request asks for documents that relate to BellSouth's response to Interrogatory No. 24(c). Because the issue related to that Interrogatory has been settled, BellSouth did not provide a Response.

6. In response to Request to Produce No. 10, BellSouth states that there are no responsive documents because this Request asks for documents that relate to BellSouth's response to Interrogatory No. 25(a) and (b). Because the issue related to that Interrogatory has been settled, BellSouth did not provide a Response.

Respectfully submitted this 2nd day of July, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White (KR)

NANCY B. WHITE

c/o Nancy Sims

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