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RECORDS AND REPORTING

ORIGINAL

November 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. 990649-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. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

J. Phillip Carver (KR)

J. Phillip Carver

- AFA _____
- APP _____
- CAF _____
- CMU 1 _____
- CTR _____
- EAG _____
- LEG 2 _____
- MAS 5 _____
- OPC _____
- PAI _____
- SEC 1 _____
- WAW _____
- OTH _____

Enclosures

cc: All parties of record
M. M. Criser, III
N. B. White
R. D. Lackey

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

13439 NOV-2 99

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into)
pricing of unbundled network)
elements)
_____)

Docket No. 990649-TP

Filed: November 2, 1999

**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 October 8, 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 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.

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

DOCUMENT NUMBER-DATE

13439 NOV-28

FPSC-RECORDS/REPORTING

SPECIFIC RESPONSES

4. In response to Request to Produce No. 8, BellSouth agrees to produce the requested documents at a mutually agreeable time and place. Also, BellSouth notes that the Exhibits to the pre-filed Direct Testimony of BellSouth witness, Alphonso Varner, are also responsive to this request.

5. In response to Request to Produce No. 9, BellSouth agrees to produce the requested documents at a mutually agreeable time and place. Also, BellSouth notes that the Exhibits to the pre-filed Direct Testimony of BellSouth witness, Alphonso Varner, are also responsive to this request.

Respectfully submitted this 2nd day of November, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

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184512

**CERTIFICATE OF SERVICE
Docket No. 990649-TP**

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

U.S. Mail this 2nd day of November, 1999 to the following:

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