J. PHILLIP CARVER General Attorney

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

January 26, 2000



Mrs. Blanca S. Bayó Director, Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

#### Docket No. 991838-TP Re:

Dear Ms. Bayó:

Enclosed please find the original and fifteen copies of BellSouth Telecommunications, Inc.'s Amendment to Discovery Responses, which we ask that you file in the above-referenced 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,

5. Phillip Griver (10)

J. Phillip Carver

cc: All Parties of Record Marshall M. Criser III R. Douglas Lackey Nancy B. White turos EAG RECEIVED & FILED LEG RRR UREAU OF RECORDS Y MAN OTH

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# CERTIFICATE OF SERVICE DOCKET NO. 991838-TP

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

via facsimilie(\*) and U.S. Mail this 26th day of January, 2000 to the following:

Donna Clemons (\*) Staff Counsel Division of Legal Services Florida Public Service Comm. 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Henry C. Campen (\*) John A. Doyle Parker, Poe, Adams & Berstein, LLP First Union Captiol Center 150 Fayetteville Street Mall Suite 1400 Raleigh, N.C. 27602 Tel. No. (919) 828-0564 Fax. No. (919) 834-4564

Vicki Gordon Kaufman McWhirter, Reeves, McGlothlin, Davidson, Decker, Kaufman, Arnold & Steen, P.A. 117 South Gadsden Street Tallahassee, FL 32301 Tel. No. (850) 222-2525 Fax. No. (850) 222-5606

Norton Cutler V.P. Regulatory & General Counsel BlueStar Networks, Inc. L & C Tower, 24th Floor 401 Church Street Nashville, Tennessee 37219 Bluestar Networks, Inc. 131 2nd Avenue North Suite 500 Nashville, Tennessee 37201 Tel. No. (615) 255-2100 Fax. No. (615) 255-2102

John A. Doyle, Jr. Parker, Poe, Adams & Berstein, LLP First Union Capitol Center 150 Fayetteville Street Mall Suite 1400 Raleigh, North Carolina 27602

J. Hullip Carver (KE)

J. Phillip Carver

### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re:

Petition for Arbitration of BlueStar ) Networks, Inc. with BellSouth ) Telecommunications, Inc. Pursuant ) To the Telecommunications Act of 1996 )

Docket No. 991838-TP

Filed: January 26, 2000

## BELLSOUTH TELECOMMUNICATIONS, INC.'S AMENDMENT TO DISCOVERY RESPONSES

BellSouth Telecommunications, Inc. ("BellSouth"), hereby files its Amendment to Discovery previously propounded by BlueStar Networks, Inc. ("BlueStar"), and states the following:

1. On January 18, 2000, BellSouth objected to BlueStar's Request to Produce No. 8 because, although the request did not call for information regarding retail offerings on its face, it appeared to be so broad as to encompass this information. BellSouth has since determined that the only responsive documents that it has in its possession, custody or control relate to unbundled network elements, i.e., wholesale rather than retail services. Accordingly, BellSouth withdraws its objection and agrees to produce the responsive information at a mutually agreeable time and place. BellSouth also notes, however, that this information is proprietary, that it will be produced only upon the execution of an appropriate protective order, and that it may be viewed only by the persons who are covered by the protective agreement.

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2. In BellSouth's response to BlueStar's Interrogatory No. 1, BellSouth identified particular engineering guidelines and stated that this information is proprietary. BellSouth has determined that, although the contents of the guidelines are proprietary, the fact that BellSouth utilizes these guidelines is not. Therefore, BellSouth withdraws the proprietary classification for its response to BlueStar's Interrogatory No. 1.

Respectfully submitted this 26th day of January, 2000.

## BELLSOUTH TELECOMMUNICATIONS, INC.

Mar nue NANCYOB. WHITE

MICHAEL P. GOGGIN c/o Nancy Sims 150 South Monroe Street, #400 Tallahassee, Florida 32301 (305) 347-5558

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