

RECEIVED-FPSC

Legal Department

Bennett L. Ross
General Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0793

00 JUN -8 PM 4:44

RECORDS AND
REPORTING

June 8, 2000

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

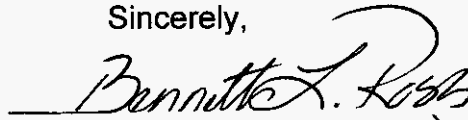
Re: Docket No. 990649-TP (UNEs)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Objections and Responses to AT&T's Third Set of Requests for Production of Documents and Third Set of Interrogatories, which we ask that you file in the captioned docket.

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,



Bennett L. Ross (1/2)

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Nancy B. White

APP _____
CAF _____
CMP 5
COM 5
CTR _____
ECR _____
LEG 2
OPC _____
PAI _____
RGO _____
SEC 1
SER _____
OTH _____

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

07042 JUN-88

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into)	
Pricing of Unbundled Network)	Docket No. 990649-TP
Elements)	
_____)	Filed: June 8, 2000

BELLSOUTH TELECOMMUNICATIONS, INC.'S
OBJECTIONS AND RESPONSES TO
AT&T'S THIRD REQUEST FOR PRODUCTION OF DOCUMENTS

GENERAL OBJECTIONS

BellSouth Telecommunications, Inc. ("BellSouth" or "Company") asserts the following general objections to the Third Request for Production of Documents served by AT&T Communications of the Southern States, Inc. ("AT&T") on May 19, 2000.

1. BellSouth objects to the requests to the extent that such requests seek to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such requests are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. BellSouth has interpreted AT&T's requests to apply to BellSouth's regulated intrastate operations in Florida and will limit its responses accordingly. To the extent that any request is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission, BellSouth objects to such request to produce as irrelevant, overly broad, unduly burdensome, and oppressive.

DOCUMENT NUMBER-DATE

07042 JUN-88

FPSC-RECORDS/REPORTING

3. BellSouth objects to each and every request and instruction to the extent that such request or instruction calls for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. BellSouth objects to each and every request insofar as the request is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these requests. Any responses provided by BellSouth in response to AT&T's requests will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth objects to each and every request insofar as the request is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

6. BellSouth objects to AT&T's discovery requests, instructions and definitions, insofar as they seek to impose obligations on BellSouth that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

7. BellSouth objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission, or elsewhere.

8. BellSouth objects to each and every request, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. BellSouth objects to each and every request to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to

Section 90.506, Florida Statutes. To the extent that AT&T's requests proprietary confidential business information which is not subject to the "trade secrets" privilege, BellSouth will make such information available to counsel for AT&T, consistent with applicable law, subject to any other general or specific objections contained herein.

10. BellSouth is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, BellSouth creates countless documents that are not subject to Florida Public Service Commission or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document will be provided in response to these discovery requests. Rather, BellSouth's responses will provide, subject to any applicable objections, all of the information obtained by BellSouth after a reasonable and diligent search conducted in connection with these requests. BellSouth shall conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the discovery requests purport to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense. To the extent that AT&T requests herein documents that have previously been produced to other parties in response to previous discovery, then without limiting any of the foregoing objections, BellSouth incorporates herein by reference its objections to that previous discovery.

REQUESTS FOR PRODUCTION

Subject to the General Objections stated herein, BellSouth provides the following responses to AT&T's Third Requests for Production:

REQUEST No. 49: Please provide the Service Order Study referenced on line 3 of Appendix F, file SVCORD00.xls.

RESPONSE: Files SORTOCOE.xls and SORTOOSP.xls, for COE (Central Office Equipment) and OSP (Outside Plant) studies respectively, are furnished in response to this request. The following is offered to aid in the understanding of the service order study process and subsequent utilization. The service order ratio study for COE develops service order ratios that reflect, for each FRC (Field Reporting Code), a % of total central office maintenance time spent on service order related activity for the specific FRC (i.e., COE FRC SO [Service Order] to TOTAL ALL COE FRCs). The service order ratio study for OSP develops service order ratios that reflect, for each FRC, a % of time spent on service order related activity for that specific FRC (i.e., OSP FRC SO to OSP TOTAL FRC). These ratios are then applied on a state specific basis within the Plant Specific Application to remove service order related costs from total expenses. The state results are rolled up to a regional subtotal and region composite service order ratios are developed for use within the shared and common application.

REQUEST No. 50: Please provide an index identifying each and every SRC used by BellSouth in any of its analysis.

RESPONSE: See the attached pages, "Chart of Accounts – Accounts and Subsidiary Records Categories (SRCs)". This information is proprietary and is being provided subject to the provisions of the non-disclosure agreement executed by AT&T.

Respectfully submitted this 8th day of June, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE
MICHAEL P. GOGGIN
c/o Nancy Sims
150 South Monroe Street, #400
Tallahassee, Florida 32301
(305) 347-5555



BENNETT L. ROSS
E. EARL EDENFIELD, JR.
675 West Peachtree Street, #4300
Atlanta, Georgia 30375
(404) 335-0793



215698

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

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
Federal Express and Hand-Delivery (#) this 8th day of June, 2000 to the following:

Donna Clemons
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6216
Fax. No. (850) 413-6217

Joseph A. McGlothlin (+)
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
Attys. For FCCA
*Atty. for BlueStar

Marsha Rule (+)
AT&T Communications
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
Tel. No. (850) 425-6364
Fax. No. (850) 425-6343

Jim Lamoureux (+) (#)
AT&T Communications
1200 Peachtree Street, N.E.
Room 8068
Atlanta, Georgia 30309
Tel. No. (404) 810-4196
Fax. No. (404) 877-7648

Richard D. Melson (+)
Gabriel E. Nieto *
Hopping Green Sams & Smith, P.A.
Post Office 6526
123 South Calhoun Street
Tallahassee, FL 32314
Tel. No. (850) 222-7500
Fax. No. (850) 224-8551
Atty. For MCI
Atty. for Rhythms Link
Atty. for ACI *

Dulaney L. O'Roark
MCI Telecommunications Corporation
6 Concourse Parkway
Suite 600
Atlanta, GA 30328
Tel. No. (770) 284-5498
Fax. No. (770) 284-5488

Floyd Self
Norman H. Horton, Jr. •
Messer, Caparello & Self
Post Office Drawer 1876
215 South Monroe Street, Suite 701
Tallahassee, FL 32302-1876
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Attys. for WorldCom
Atty. for NorthPoint *

Terry Monroe
Vice President, State Affairs
Competitive Telecomm. Assoc.
1900 M Street, N.W.
Suite 800
Washington, D.C. 20036
Tel. No. (202) 296-6650
Fax. No. (202) 296-7585

Susan Huther
Rick Heapter
MGC Communications, Inc.
3301 Worth Buffalo Drive
Las Vegas, Nevada 89129
Tel. No. (702) 310-4272
Fax. No. (702) 310-5689

John Kerkorian (+)
MGC Communications
d/b/a Mpower Communications Corp.
Regional Vice President
Legal & Regulatory Affairs
Southeast Region
5607 Glenridge Drive, Suite 310
Atlanta, GA 30342
Tel. No. (404) 554-1000
Fax. No. (404) 554-0010

Jeremy Marcus (+)
Kristin Smith
Blumenfeld & Cohen
1625 Massachusetts Ave., Ste. 300
Washington, D.C. 20036
Tel. No. (202) 955-6300
Fax. No. (202) 955-6460

Kimberly Caswell (+)
GTE Florida Incorporated
One Tampa City Center
201 North Franklin Street
Tampa, Florida 33602
Tel. No. (813) 483-2617
Fax. No. (813) 204-8870

Peter M. Dunbar, Esq.
Marc W. Dunbar, Esq.
Pennington, Moore, Wilkinson &
Dunbar, P.A.
215 South Monroe Street, 2nd Flr.
Tallahassee, Florida 32301
Tel. No. (850) 222-3533
Fax. No. (850) 222-2126

Carolyn Marek (+)
Vice President of Regulatory Affairs
Southeast Region
Time Warner Communications
233 Bramerton Court
Franklin, Tennessee 37069
Tel. No. (615) 376-6404
Fax. No. (615) 376-6405

Mark E. Buechele, Esquire
Supra Telecom
1311 Executive Center Drive
Koger Center - Ellis Building
Suite 200
Tallahassee, FL 32301-5027
Tel. No. (850) 402-0510
Fax. No. (850) 402-0522

Donna Canzano McNulty, Esq. (+)
MCI WorldCom, Inc.
325 John Knox Road
The Atrium Bldg., Suite 105
Tallahassee, FL 32303
Tel. No. (850) 422-1254
Fax. No. (850) 422-2586

Michael A. Gross (+)
VP Reg. Affairs & Reg. Counsel
Florida Cable Telecomm. Assoc.
310 North Monroe Street
Tallahassee, FL 32301
Tel. No. (850) 681-1990
Fax. No. (850) 681-9676

ACI Corp.
7337 S. Revere Parkway
Englewood, CO 80112
Tel. No. (303) 476-4200
Fax. No. (303) 476-4201

Florida Public Telecomm. Assoc.
Angela Green, General Counsel
125 South Gadsden Street
#200
Tallahassee, FL 32301-1525
Tel. No. (850) 222-5050
Fax. No. (850) 222-1355

Intermedia Communications, Inc.
Scott Sapperstein (+)
Sr. Policy Counsel
3625 Queen Palm Drive
Tampa, FL 33619-1309
Tel. No. (813) 829-4093
Fax. No. (813) 829-4923

TCG South Florida
c/o Rutledge Law Firm
Kenneth Hoffman
215 South Monroe Street, Ste. 420
Tallahassee, FL 32301
Tel. No. (850) 681-6788
Fax. No. (850) 681-6515

Time Warner AxS of FL, L.P.
2301 Lucien Way
Suite 300
Maitland, FL 32751
Represented by Pennington Law Firm

Glenn Harris, Esq.
NorthPoint Communications, Inc.
222 Sutter Street
7th Floor
San Francisco, CA 94108
Tel. No. (415) 365-6095
Fax. No. (415) 403-4004
Email Fax. (503) 961-1314

Charles J. Rehwinkel (+)
1313 Blair Stone Road
Tallahassee, FL 32301
Tel. No. (850) 847-0244
Fax. No. (850) 878-0777
Counsel for Sprint

John P. Fons (+)
Ausley & McMullen
Washington Square Building
227 South Calhoun Street
Tallahassee, FL 32301
Tel. No. (850) 224-9115
Fax. No. (850) 222-7560
Counsel for Sprint

Brian Sulmonetti
MCI WorldCom, Inc.
6 Concourse Parkway
Suite 3200
Atlanta, GA 30328
Tel. No. (770) 284-5500

Catherine F. Boone, Esq. (+)
Regional Counsel
Covad Communications Company
10 Glenlake Parkway
Suite 650
Atlanta, GA 30328-3495
Tel. No. (678) 579-8388
Fax. No. (678) 320-9433

Charles J. Beck
Deputy Public Counsel
Office of the Public Counsel
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400
Tel. No. (850) 488-9330
Fax. No. (850) 488-4491

Eric J. Branfman (+)
Morton J. Posner (+)
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007-5116
Tel. No. (202) 424-7500
Fax. No. (202) 424-7645
Represents Florida Digital Network, Inc.
Represents KMC, KMC II & KMC III

John McLaughlin
KMC Telecom. Inc.
Suite 170
3025 Breckinridge Boulevard
Duluth, GA 30096
Tel. No. (770) 931-5260
Fax. No. (770) 638-6796

Bettye Willis (+)
ALLTEL Communications
Services, Inc.
One Allied Drive
Little Rock, AR 72203-2177

J. Jeffrey Wahlen (+)
Ausley & McMullen
227 South Calhoun Street
Tallahassee, FL 32301
Tel. No. (850) 425-5471
Fax. No. (850) 222-7560
Atty. for ALLTEL

Stephen P. Bowen
Blumenfeld & Cohen
4 Embarcadero Center
Suite 1170
San Francisco, CA 94111
Tel. No. (415) 394-7500
Fax. No. (415) 394-7505

Norton Cutler (+)
General Counsel
BlueStar Networks, Inc.
401 Church Street
24th Floor
Nashville, Tennessee 37201
Tel. No. (615) 346-3848
Fax. No. (615) 255-2102

Michael Bressman (+)
Associate General Counsel
401 Church Street
24th Floor
Nashville, Tennessee 37201
Tel. No. (615) 346-6660
Fax. No. (615) 255-2102

Patrick K. Wiggins
Wiggins & Villacorta, P.A.
2145 Delta Boulevard, Suite 200
Tallahassee, FL 32303

George S. Ford (+)
Chief Economist
Z-Tel Communications, Inc.
601 South Harbour Island Blvd.
Tampa, FL 33602
Tel. No. (813) 233-4630
Fax. No. (813) 233-4620
gford@z-tel.com

Jonathan E. Canis
Michael B. Hazzard
Kelley Drye & Warren, LLP
1200 19th Street, NW, Fifth Floor
Washington, DC 20036
Tel. No. (202) 955-9600
Fax. No. (202) 955-9792
jacanis@kelleydrye.com
mhazzard@kelleydrye.com
Counsel for Z-Tel Communications, Inc.

Rodney L. Joyce
Shook, Hardy & Bacon, LLP
600 14th Street, N.W., Suite 800
Washington, D.C. 20005-2004
Tel. No. (202) 639-5602
Fax. No. (202) 783-4211
rjoyce@shb.com
Represents Network Access Solutions

Jon C. Moyle, Jr., Esq.
Cathy M. Sellers, Esq.
Moyle, Flanigan, Katz, Kolins,
Raymond & Sheehan, P.A.
The Perkins House
118 North Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 681-3828
Fax. No. (850) 681-8788
Attys. for Global NAPs
jmoylejr@moylelaw.com
csellers@moylelaw.com

Russell M. Blau
Marc B. Rothschild
Swidler Berlin Shereff Friedman
3000 K Street, N.W.
Suite 300
Washington, D.C. 20007-5116
Tel. No. (202) 424-7755
Fax. No. (202) 424-7643
Attys. for Broadslate Networks, Inc.
Attys. for @link Network, Inc.

John Spilman
Director Regulatory Affairs and
Industry Relations
Broadslate Networks, Inc.
675 Peter Jefferson Parkway
Suite 310
Charlottesville, VA 22911
Tel. No. (804) 220-7606
Fax. No. (804) 220-7701

Constance L. Kirkendall
Regulatory Manager
@link Network, Inc.
2220 Campbell Creek Blvd.
Suite 110
Richardson, TX 75082-4420
Tel. No. (972) 367-1700
Fax. No. (972) 367-1775

Gary Cohen (+)
Blumfeld & Cohen
1625 Massachusetts Ave., N.W.
Suite 320
Washington, D.C. 20036
Represents Rhythms Links, Inc.


Bennett L. Ross (for)

(+) Signed Protective Agreement