

NANCY B. WHITE
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BellSouth Telecommunications, Inc.
150 South Monroe Street
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October 27, 1997

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

RE: Docket No. 971044-TP

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response and Objections to National Tel's First Request for Production of Documents. Please file these documents 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 on the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White
Nancy B. White (Hwl)

- ACK _____
- AFA _____
- AFP _____
- CAS _____
- CMS _____
- CTM _____
- EM _____
- LE 7 _____
- LI 3 _____
- OT _____
- PL _____
- SEL 1 _____
- W/S _____
- OTH _____

Enclosures

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
W. J. Ellenberg

DOCUMENT NUMBER-DATE
11089 OCT 27 97
FPSC-RECORDS/REPORTIN

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition by National) Docket No.: 971044-TP
Telecommunications, Inc., for)
Resolution of Dispute With)
BellSouth Telecommunications, Inc.)
_____) Filed: October 27, 1997

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSE
AND OBJECTION TO NATIONAL TEL'S FIRST
REQUEST FOR PRODUCTION OF DOCUMENTS**

BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), hereby files, pursuant to Rule 25-22.034 and 25-22.035, Florida Administrative Code, and Rules 1.340 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following Response and Objections to National Telecommunications, Inc.'s ("National Tel") First Request for Production of Documents to BellSouth dated September 25, 1997.

GENERAL RESPONSES

BellSouth makes the following General Responses to National Tel's First Request for Production of Documents.

1. BellSouth has interpreted National Tel's requests to apply to BellSouth's regulated intrastate operations in Florida and limits its Answers 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 as irrelevant, overly broad, unduly burdensome, and oppressive.

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

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FPSC-RECORDS/REPORTING

RESPONSES TO SPECIFIC RESPONSES

Subject to, and without waiver of, the foregoing general responses, BellSouth enters the following specific responses with respect to National Tel's requests:

3. With respect to Request No. 1, BellSouth objects to this request on the basis that it is unduly burdensome, overly oppressive, and seeks customer proprietary information. The Secondary Service Order Charge is imposed on every ALEC in Florida where circumstances warrant. Those circumstances are set forth in BST's General Subscriber Service Tariff, Section A4.2.4.

4. With respect to Request No. 2, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

5. With Respect to Request No. 3, BellSouth objects to this request on the basis that it is unduly burdensome, overly oppressive, and seeks customer proprietary information. The Secondary Service Order Charge is imposed on every ALEC in Florida where circumstances warrant. Those circumstances are set forth in BST's General Subscriber Service Tariff, Section A4.2.4.

6. With Respect to Request No. 4, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

7. With Respect to Request No. 5, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

8. With Respect to Request No. 6, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

Respectfully submitted this 27th day of October, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (per)

ROBERT G. BEATTY
NANCY B. WHITE
c/o Nancy Sims
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(305) 347-5555

William J. Ellenberg II (per)

WILLIAM J. ELLENBERG II
J. PHILLIP CARVER
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Atlanta, Georgia 30375
(404) 335-0711

CERTIFICATE OF SERVICE
Docket No. 971044-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via U.S. Mail this 27th day of October, 1997 to the following:

Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

C. Everett Boyd, Jr.
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Tel. No. (850) 224-9135
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Atty. for National Tel.

Nancy B. White
Nancy B. White (BWL)