

ORIGINAL

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December 8, 1997

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

RE: Docket No. 960833-TP; 960846-TP; 960916-TP

Dear Ms. Bayo:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response and Objections to AT&T's Third 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,

Bennett L. Ross (ke)

Bennett L. Ross

WCK ✓
AFB 4
APP _____
CAF _____
CMU Sumner
CTR _____
EAG _____
LEG 2
LIN 5
OPC _____
RIN _____
TAL 1
TSC _____
TTC _____

Enclosures

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

RECEIVED & FILED
[Signature]
AREA OF RECORDS

DOCUMENT NUMBER-DATE

12531 DEC-86

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petitions by AT&T)	Docket No. 960833-TP
Communications of the Southern)	
States, Inc., and MCI)	Docket No. 960846-TP
Telecommunications Corporation,)	
MCI Metro Access Transmission)	
Services, Inc., for arbitration)	
of certain terms and conditions)	
of a proposed agreement with)	
BellSouth Telecommunications,)	
Inc. concerning interconnection)	
and resale under the)	
Telecommunications Act of 1996)	
)	
In the matter of)	Docket No. 960757-TP
)	
MFS Communications Company, Inc.)	
)	
Petition for Arbitration Pursuant)	
to 47 U.S.C. § 252(b) of)	
Interconnection Rates, Terms, and)	
Conditions with)	
)	
BellSouth Telecommunications, Inc.)	
)	
In the Matter of)	Docket No. 960916-TP
Petition by American)	
Communications Services, Inc.)	
and American Communications)	
Services of Jacksonville, Inc.)	
for Arbitration with BellSouth)	
Telecommunications, Inc.)	
pursuant to the)	
Telecommunications Act of 1996)	
)	
In re: Petition by MCI Metro Access)	Docket No. 971140-TP
Transmission Services, Inc., to Set)	
Non-Recurring Charges for)	
Combination of Network Elements)	
to Set Non-Recurring Charges for)	
Combination of Network Elements)	
with BellSouth Telecommunications, Inc.)	
)	Filed: December 8, 1997

DOCUMENT NUMBER-DATE

12531 DEC-85

FPSC-RECORDS/REPORTING

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
RESPONSE AND OBJECTIONS TO AT&T'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 Response and Objections to AT&T Communications of the Southern States, Inc. ("AT&T") Third Request for Production of Documents, dated November 21, 1997.

GENERAL RESPONSE AND OBJECTIONS

1. With regard to AT&T's definition of "document" or "documents", BellSouth has made a diligent, good faith attempt to locate documents responsive to the scope of AT&T's individual requests for documents.

2. BellSouth does not believe it was AT&T'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.

SPECIFIC RESPONSE

4. With respect to Request No. 58, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place subject to the Protective Agreement between BellSouth and AT&T.

5. With respect to Request No. 59, BellSouth objects to this request on the grounds that the documents requested are not relevant to any issue in this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

6. With respect to Request No. 60, BellSouth objects to this request on the grounds that the documents requested are not relevant to any issue in this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

7. With respect to Request No. 61, BellSouth objects to this request on the grounds that the documents requested are not relevant to any issue in this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Respectfully submitted this 8th day of December, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (kr)

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CERTIFICATE OF SERVICE
DOCKET NOS. 960833-TP/960846-TP/960757-TP/960916-TP/971140-TP

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

* Hand-Delivery and Federal Express this 8th day of December, 1997 to the following:

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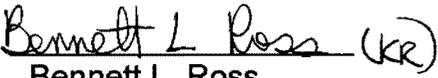
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Bennett L. Ross