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ORIGINAL
Legal Department

J. PHILLIP CARVER
General Attorney

98 JUL 29 PM 4: 29

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

RECORDS AND
REPORTING

July 29, 1998

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

RE: Docket No. 980696-TP

Dear Ms. Bayo:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s First Request for Production of Documents to AT&T of the Southern States, Inc. 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,

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

J. Phillip Carver (K.R.)

J. Phillip Carver

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- LIN _____
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

Enclosures

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

DOCUMENT NUMBER-DATE

08008 JUL 29 98

FPSC-RECORDS/REPORTING

or printouts; and a copy of such writing or record where the original is not in the possession, custody or control of AT&T.

3. If AT&T has possession, custody, or control of the originals of the documents requested, please produce the original or a complete copy of the originals and all copies which are different in any way from the original, whether by interlineation, receipt stamp or notation. If AT&T does not have possession, custody or control of the originals of the documents requested, please produce any copies in the possession, custody, or control, however made, of AT&T.

4. Any objection, whether in whole or part, to production of the requested documents that claims confidentiality of any document should, under the applicable rules, be accompanied by a motion for protective order. If you wish to utilize a protective agreement regarding such documents, please notify BellSouth at least ten days prior to the discovery due date, of your desire to resolve informally the objection based upon a claim of confidentiality.

5. "AT&T" means the entities to which this Request is addressed, their parents, predecessors, successors, subsidiaries, divisions, departments, affiliates, and other persons acting on behalf of any of them, including any consultants, attorneys, or other agents having control, custody, knowledge, or possession of, or responsibility for, any documents called for by this Request.

6. Please construe "and" as well as "or" either disjunctively or conjunctively as necessary to bring within the scope of this Request any

documents that might otherwise be construed to be outside the scope of any particular request.

DOCUMENTS REQUESTED

1. Please provide all records from the PNR DBF file of customer *points* for the state of Florida, i.e., all points from which the Hatfield clusters are formed. These point records must contain the following data for each point (whether geocode or surrogate):

1. Wire Center CLLI;
2. Cluster Path, i.e., that which is the full cluster name, such as "C001.001002";
3. Latitude of the point;
4. Longitude of the point;
5. An indication of whether the point is on the periphery of the convex hull of the cluster and--if it is--a number indicating that point's order in the sequence of points that form the convex hull of this cluster;
6. An indication of whether this is a business or residential point;
7. An indication of whether this is a geocoded or surrogate point;

Please provide the *points* DBF file for the entire state of Florida, as provided for Nevada, Minnesota, and Tennessee to either Stopwatch Maps,

CERTIFICATE OF SERVICE
DOCKET NO. 980696-TP (HB4785)

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express and Hand Delivery* this 29th day of July, 1998 to the following:

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J. Phillip Carver (cc)
J. Phillip Carver

(+) Protective Agreements