

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Discovery and related study on fair)
and reasonable rates and on relationships)
among costs and charges associated)
with certain telecommunications services)
provided by local exchange companies)
(LECs), as required by Chapter 98-277,)
Laws of Florida.)

Docket 980733-TL

Filed August 5, 1998

FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
TO BELL SOUTH BY FLORIDA LEGAL SERVICES

Florida Legal Services ("FLS") requests that BellSouth Telecommunications, Inc.
("BellSouth") produce the following documents for inspection and copying at the office of
Florida Legal Services, 2121 Delta Boulevard, Tallahassee, FL 32303, by U.S. mail or other
means, on or before Monday, August 17, 1998, or at such other time and place as may be
mutually agreed upon by counsel.

INSTRUCTIONS

1. If any document is withheld under any claim of privilege, please furnish a list identifying

ACK _____ each document for which privilege is claimed, together with the following information: date,
AFA _____
APP _____ sender, recipients, recipients of copies, subject matter of the document, and the basis upon which
CAF _____
CMU _____ such privilege is claimed.

CTR _____ 2. Please produce complete copies of the originals of the documents requested.

LEG _____ 3. Please construe "and" as well as "or" either disjunctively or conjunctively as necessary to

LIN _____ bring within the scope of this production of documents any document which might otherwise be

OPC _____
RCH _____
SEC [handwritten mark]
WAS _____
OTH _____

DOCUMENT NUMBER-DATE
08371 AUG -6 8
FPSC-RECORDS/REPORTING

construed to be outside the scope.

4. Words in the past tense include the present, and words in the present tense include the past. Use of the singular includes the plural, and use of the masculine includes the feminine where appropriate, and vice versa.

DEFINITIONS

1. "Document" or "documents" means any written, recorded, filmed or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device or any other media, including, but not limited to, memoranda, notes, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, and notes, any of which are in your possession, custody, or control.

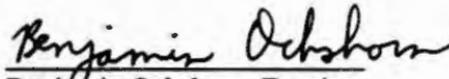
2. As used herein, "you" and "your" means BellSouth together with its officers, employees, consultants, agents, representatives, attorneys (unless privileged), and any other person or entity acting for or on behalf of BellSouth.

DOCUMENTS REQUESTED

1. All documents requested of BellSouth by letters dated June 19, 1998, from Walter D'Haeseleer and Tom Devlin of the Florida Public Service Commission to all local exchange companies regarding 980000A-SP, undocketed special project, fair and reasonable rates.

2. All documents requested of BellSouth by the First Request for Production of Documents to BellSouth by the Attorney General and the Citizens of Florida, dated June 19, 1998.
3. All documents requested of BellSouth by Citizens' Third Request for Production of Documents to BellSouth, dated July 16, 1998.
4. All documents requested of BellSouth by Citizens' First Set of Interrogatories to BellSouth, dated July 16, 1998, including responsive answers and supporting documents.

Respectfully submitted,



Benjamin Ochshorn, Esquire
Florida Bar No. 0382566
FLORIDA LEGAL SERVICES
2121 Delta Boulevard
Tallahassee, FL 32303
850/385-7900

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of the foregoing Request for Production of Documents were served by U.S. Mail to Nancy White, c/o Nancy Sims, BellSouth Telecommunications, Inc., 150 South Monroe Street, Suite 400, Tallahassee, FL 32301-1556; and that a true and correct copy was provided by U.S. Mail this 5th day of August, 1998, to:

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

Gene Adams
Florida Association of Realtors
Post Office Box 1853
Tallahassee, FL 32302-1853

Monica Barone
Sprint
3100 Cumberland Circle, #802
Atlanta, GA 30339

Charles Beck
Earl Poucher
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison St., Room 812
Tallahassee, FL 32399-1400

Monte Belote
6801 Seaview Way
Tampa, FL 33615

Everett Boyd
Ervin Law Firm
P.O. Drawer 1170
Tallahassee, FL 32302

Lynne G. Brewer
Northeast Florida Telephone Co.
P.O. Box 485
Macclenny, FL 32063-0485

John L. Brewerton, III, P.A.
250 N. Orange Avenue, Suite 1700
Orlando, FL 32801

Steven Brown
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619-1309

Frankie Callen
Vice President of Governmental Affairs
Greater Orlando Assoc. of REALTORS
Post Office Box 587
Orlando, FL 32802-0587

Donna Canzano
Wiggins & Villacorta
P.O. Drawer 1657
Tallahassee, FL 32302

Kimberly Caswell
GTE Florida Incorporated
P.O. Box 110, FLTC0007
201 N. Franklin Street, 16th Floor
Tampa, FL 33601-0110

William P. Cox
Division of Legal Services
Florida Public Service Comm.
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

David Daniel
House Democratic Office
316, The Capitol
402 S. Monroe Street
Tallahassee, FL 32399-1300

John Ellis
Rutledge, Ecenia, Underwood,
Purnell & Hoffman, P.A.
P.O. Box 551
Tallahassee, FL 32302

David B. Erwin
127 Riversink Road
Crawfordville, FL 32327

Harriet Eudy
ALLTEL
206 White Avenue
Live Oak, FL 32060-0550

James C. Falvey
e.spire Communications, Inc.
133 National Business Parkway
Suite 200
Annapolis Junction, MD 20701

John Fons
Ausley & MacMullen
227 S. Calhoun Street
Tallahassee, FL 32301

Laura Gallagher
Florida Cable Telecommunications
Association, Inc.
310 N. Monroe Street
Tallahassee, FL 32301

Kelly Goodnight
Frontier Communications
180 S. Clinton Ave.
Rochester, NY 14646-0995

Angela Green
FPTA
125 S. Gadsden St., #200
Tallahassee, FL 32301-1525

Patricia Greene
Connie Shivers
Holland & Knight, P.A.
315 S. Calhoun Street, Suite 600
Tallahassee, FL 32301

Michael Gross
Office of the Attorney General
Department of Legal Affairs
The Capitol, PL-01
Tallahassee, FL 32399-1050

Tracy Hatch
AT&T
101 North Monroe Street, Suite 700
Tallahassee, FL 32301-1549

Kenneth Hoffman
Rutledge, Ecenia, Underwood,
Purnell & Hoffman, P.A.
P.O. Box 551
Tallahassee, FL 32302

Norman Horton
Messer, Caparello & Self, P.A.
P.O. Box 1876
Tallahassee, FL 32302

House Committee on Utilities
& Communications
Booter Imhoff/Charlie Murphy
428 House Office Building
Tallahassee, FL 32399-1300

Bill Huftenhower
Lynn B. Hall
Vista-United
P. O. Box 10180
Lake Buena Vista, FL 32830-0180

Chris Keena, Property Operations Mgr
Compass Management & Leasing, Inc.
1801 Hermitage Boulevard, Suite 130
Tallahassee, FL 32308

Mike Lacour
GTC, Inc.
P. O. Box 220
Port St. Joe, FL 32456-0220

Susan Langston
FTIA
1311-A Paul Russell Road, #102-A
Tallahassee, FL 32302

Mike Loconto
Julie S. Myers
Smith, Bryan & Myers
311 E. Park Avenue
Tallahassee, FL 32301

Tom McCabe
TDS Telecom/Quincy Telephone
P. O. Box 189
Quincy, FL 32353-0189

Jim McGinn
ITS Telecommunications Systems, Inc.
Post Office Box 277
Indiantown, FL 34956

Joe McGlothlin
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas, P.A.
117 S. Gadsden St.
Tallahassee, FL 32301

Richard Melson
Hopping, Green, Sams & Smith, P.A.
P.O. Box 6526
Tallahassee, FL 32314

Rhonda Merritt, Asst. V.P.
AT&T
101 North Monroe Street, Suite 700
Tallahassee, FL 32301-1549

Debra K. Mink, R.P.A., President
Legislative Chair, BOMA Florida
Mink & Mink
Sunnyvale Building
3081 East Commercial Boulevard
Ft. Lauderdale, FL 33308

Edward Paschall
AARP of Florida
1923 Atapha Nene
Tallahassee, FL 32301-5850

Charles J. Rehwinkel
Sprint-Florida, Inc.
1313 Blairstone Road
MC FLTH00107
Tallahassee, FL 32316

Senate Comm. on Reg. Industries
John Guthrie/Susan Masterton
418 Senate Office Bldg.
Tallahassee, FL 32399

South Florida Business Journal
Alexis Muellner
1320 S. Dixie Highway
Coral Gables, FL 33146

Richard (Dick) L. Spears
9132 Ridge Pine Trail
Orlando, FL 32819

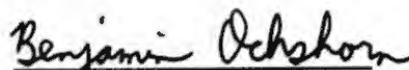
Brian Sulmonetti
WorldCom Technologies, Inc.
1515 S. Federal Highway, Suite 400
Boca Raton, FL 33432-7404

David Swafford
Pennington, Moore, Wilkinson
& Dunbar, P.A.
P.O. Box 10095
Tallahassee, FL 32301

Michael Twomey, Esq.
Rt 28 Box 1264
8903 Crawfordville Road
Tallahassee, FL 32310

Jennifer Uhal
StateScape
1911 N. Fort Myer Drive, Suite 702
Arlington, VA 22209

J. Jeffery Wahlen
Ausley & MacMullen
227 S. Calhoun Street
Tallahassee, FL 32301


Benjamin Ochshorn, Esquire
FLORIDA LEGAL SERVICES