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Nancy B. White
Assistant General Counsel-Florida

BellSouth Telecommunications, Inc.
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150 South Monroe Street
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Telephone (305) 347-5558

July 28, 1997

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. 960786-TL
Section 271 Docket

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response and Objections to Staff's First Request for Production of Documents and Notice of Intent to Request Confidential Classification, which we ask that you file in the captioned matter.

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,

Nancy B. White (kr)

Nancy B. White

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

Enclosures

/vf

cc: All parties of record
A. M. Lombardo
R. G. Beatty
William J. Ellenberg II

RECEIVED & FILED
[Signature]
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
07601 JUL 28 97
FPSC-RECORDS/REPORTING

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of BellSouth)
Telecommunications, Inc. entry)
into InterLATA Services pursuant)
to Section 271 of the Federal)
Telecommunications Act of 1996)
_____)

Docket No. 960786-TL

Filed: July 28, 1997

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
RESPONSE AND OBJECTIONS TO STAFF'S FIRST REQUEST
FOR PRODUCTION OF DOCUMENTS AND NOTICE OF
INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION**

BellSouth Telecommunications, Inc. ("BellSouth") files (1) pursuant to Rule 25-22.034, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, its Response and Objections to the Florida Public Service Commission Staff's ("Staff") First Request for Production of Documents dated July 18, 1997 and (2) pursuant to Rule 25-22.006, Florida Administrative Code, its Notice of Intent to Request Confidential Classification.

NOTICE OF INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION

Some of the documents that will be produced for the Staff in response to its First Request for Production of Documents contain information which is exempted from public disclosure pursuant to §§ 119.07 and 364.183, Florida Statutes. This information is included as proprietary confidential business information under § 364.183, Florida Statutes and rule 25-22.006, Florida Administrative Code. Because these documents contain exempt information, BellSouth is filing this Notice of Intent to Request Confidential Classification, pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, in order to allow

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the Staff access to these documents without delay. The original of this Notice has been filed with the Division of Records and Reporting, and a copy has been served on the division requesting this information.

GENERAL RESPONSE AND OBJECTIONS

1. With regard to Staff's definition of "document" or "documents", BellSouth has made a diligent, good faith attempt to locate documents responsive to the scope of Staff's individual requests for documents.

2. BellSouth's does not believe it was Staff'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. 1, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place subject to the Notice of Intent filed herein.

5. 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.

6. With respect to Request No. 3, 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. 4, 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. 5, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

9. 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.

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

Respectfully submitted this 28th day of July, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

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CERTIFICATE OF SERVICE
DOCKET NO. 960786-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express and *Hand-Delivery this 28th day of July, 1997 to the following:

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