

ORIGINAL

RECEIVED-FPSC

Legal Department

NANCY B. WHITE
Assistant General Counsel-Florida

98 JUL 21 PM 4:20

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5558

RECORDS AND
REPORTING

July 21, 1998

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. 980696-TP (Universal Service - HB4785)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunication's Inc.'s Objections to Florida Cable Telecommunications Association's First Set of Interrogatories and Second Request for Production of Documents, 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.

RECEIVED & FILED
[Signature]
FPSC-BUREAU OF RECORDS

Sincerely,
Nancy B. White
Nancy B. White *(PW)*

- ACK _____
- AFA 1
- APP _____
- CAF _____
- CMU
- CTR _____
- EAG _____
- LEG 2
- LIN 5
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

Enclosures

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

DOCUMENT NUMBER-DATE

~~07678~~-JUL 21 98

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Determination of the Cost of Basic) Docket No.: 980696-TP
Local Telecommunications Service, pursuant)
to Section 364.025, Florida Statutes)
_____) Dated: July 21, 1998

**OBJECTIONS OF BELLSOUTH TELECOMMUNICATIONS, INC.
TO FCTA'S FIRST SET OF INTERROGATORIES AND
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS**

BellSouth Telecommunications, Inc. ("BellSouth"), by and through its undersigned attorneys, submits its objections to Florida Cable Telecommunications Association's ("FCTA") First Set of Interrogatories (Nos. 1-5) and Second Request for Production of Documents (Nos. 3-5) ("FCTA's 1st Interrogatories and 2nd PODs"), served on July 16, 1998, by hand delivery, stating as follows:

The objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the five-day requirement set forth in the procedural order issued by the Florida Public Service Commission (the "Commission") (Order No. PSC-98-0813-PCO-TP). The five-day requirement is unprecedented and unduly burdensome. It provides inadequate time to carefully analyze and digest the nature and scope of the discovery requests, especially when the discovery is hand-delivered to BellSouth. Consequently, in order to avoid inadvertent waiver of its objection rights, BellSouth must initially object to all discovery requests. It is not BellSouth's intention by doing so to unduly delay responses to legitimate discovery requests. Should additional grounds for objection be discovered as BellSouth prepares its Answers to this request,

DOCUMENT NO.
07678-98

be filed on August 13, 1998 will provide FCTA with sufficient time to prepare its rebuttal testimony scheduled to be filed on September 2, 1998.

Interrogatories

3. BellSouth objects to FCTA's 1st Interrogatory No. 4 on the grounds that historical rental fees are not relevant to a forward-looking cost study as required by Paragraph 4(b), Section 1 of Chapter 93-277, Laws of Florida.

4. BellSouth objects to FCTA's 1st Interrogatory No. 5 on the grounds that "the methodology used to develop the rental fees charged by BellSouth to third parties and affiliates for use of its infrastructure . . ." is not relevant to a forward-looking cost study as required by Paragraph 4(b), Section 1 of Chapter 93-277, Laws of Florida.

Production of Documents

5. BellSouth objects to FCTA's 2nd POD, No. 3 on the same grounds as stated in BellSouth's objections to FCTA's 1st Interrogatories Nos. 1-5.

6. BellSouth objects to FCTA's 2nd POD, No. 4 on the grounds that BellSouth's annual surveillance reports for the years 1995, 1996 and 1997 are not relevant to determining the forward-looking cost of providing basic local telecommunications service or any issue in this proceeding.

7. BellSouth objects to FCTA's 2nd POD, No. 5 on the grounds that BellSouth's Annual Report to the shareholders for the years 1995, 1996, and 1997 is not relevant to determining the forward-looking cost of providing basic local telecommunications service or any issue in this proceeding.

Respectfully submitted this 21st day of July, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty

ROBERT G. BEATTY

NANCY B. WHITE

c/o Nancy H. Sims

150 So. Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5555

William J. Ellenberg II

WILLIAM J. ELLENBERG II

J. PHILLIP CARVER

Suite 4300

675 W. Peachtree St., NE

Atlanta, GA 30375

(404) 335-0711

ORIGINAL

**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 this 21st day of July, 1998 to the following:

Jack Shreve, Esquire
Charles Beck, Esquire
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street, Rm. 812
Tallahassee, Florida 32399-1400
Tel. No. (850) 488-9330
Fax. No. (850) 488-4491

Michael Gross, Esquire
Assistant Attorney General
Office of the Attorney General
PL-0 1 The Capitol
Tallahassee, Florida 32399-1050
Tel. No. (850) 414-3300
Fax. No. (850) 488-6589

Tracy Hatch, Esquire
AT&T
101 N. Monroe Street, Suite 700
Tallahassee, Florida 32301
Tel. No. (850) 425-6364
Fax. No. (850) 425-6361

Richard D. Melson, Esquire
Hopping, Green, Sams & Smith, P.A.
123 South Calhoun Street
Tallahassee, Florida 32314
Tel. No. (850) 425-2313
Fax. No. (850) 224-8551
Atty. for MCI

Thomas K. Bond
MCI Metro Access Transmission
Services, Inc.
780 Johnson Ferry Road
Suite 700
Atlanta, GA 30342
Tel. No. (404) 267-6315
Fax. No. (404) 267-5992

Robert M. Post, Jr.
ITS
16001 S.W. Market Street
Indiantown, FL 34956
Tel. No. (561) 597-3113
Fax. No. (561) 597-2115

Charles Rehwinkel
Sprint-Florida, Inc.
1313 Blair Stone Road,
MC FLTHOO 107
Tallahassee, Florida 32301
Tel. No. (850) 847-0244
Fax. No. (850) 878-0777

Carolyn Marek
VP-Regulatory Affairs
S.E. Region
Time Warner Comm.
2828 Old Hickory Boulevard
Apt. 713
Nashville, TN 37221
Tel. No. (615) 673-1191
Fax. No. (615) 673-1192

Norman H. Horton, Jr., Esquire
Messer, Caparello & Self P. A.
215 South Monroe Street
Suite 701
Tallahassee, Florida 32301
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Represents e.spire™

David B. Erwin, Esquire
Attorney-at-Law
127 Riversink Road
Crawfordville, Florida 32327
Tel. No. (850) 926-9331
Fax. No. (850) 926-8448
Represents GTC, Frontier,
ITS and TDS

DOCUMENT NUMBER-DATE
07678 JUL 21 98
FPSC-RECORDS/REPORTING

Steven Brown

Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, Florida 33619-1309
Tel. No. (813) 829-0011
Fax. No. (813) 829-4923

Harriet Eudy

ALLTEL Florida, Inc.
206 White Avenue
Live Oak, Florida 32060
Tel. No. (904) 364-2517
Fax. No. (904) 364-2474

Lynne G. Brewer

Northeast Florida Telephone Co.
130 North 4th Street
Macclenny, Florida 32063
Tel. No. (904) 259-0639
Fax. No. (904) 259-7722

James C. Falvey, Esquire

e.spire™ Comm. Inc.
133 National Business Pkwy.
Suite 200
Annapolic Junction, MD 20701
Tel. No. (301) 361-4298
Fax. No. (301) 361-4277

Lynn B. Hall

Vista-United Telecomm.
3100 Bonnet Creek Road
Lake Buena Vista, FL 32830
Tel. No. (407) 827-2210
Fax. No. (407) 827-2424

William Cox

Staff Counsel
Florida Public Svc. Comm.
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6204
Fax. No. (850) 413-6250

Nancy B. White
Nancy B. White (P)