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BellSouth Telecommunications, Inc.  
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RECORDS AND  
REPORTING

July 27, 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 Attorney General's First 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.

Sincerely,

*Nancy B. White (cc)*

Nancy B. White

Enclosures

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

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AP: \_\_\_\_\_  
CAF: \_\_\_\_\_  
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SEC: 1  
WAS: \_\_\_\_\_  
OTH: \_\_\_\_\_

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FPSC-RECORDS/REPORTING

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*Nancy B. White* (ka)  
Nancy B. White

(+) Protective Agreements

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the Cost of Basic ) Docket No.: 980696-TP  
Local Telecommunications Service, pursuant )  
to Section 384.025, Florida Statutes )  
\_\_\_\_\_ ) Dated: July 27, 1998

**OBJECTIONS OF BELL SOUTH TELECOMMUNICATIONS, INC.  
TO ATTORNEY GENERAL'S FIRST REQUEST FOR  
PRODUCTION OF DOCUMENTS**

BellSouth Telecommunications, Inc. ("BellSouth"), by and through its undersigned attorneys, submits its objections to the office of the Attorney General's ("Attorney General") First Request for Production of Documents (Nos. 1-5) ("Attorney General's 1st PODs"), served on July 17, 1998, by U.S. Mail, 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, BellSouth reserves the right to revise, supplement or modify its objections. Moreover, should BellSouth determine that a Protective Order is necessary with respect to any of

Respectfully submitted this 27th day of July, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (ke)

ROBERT G. BEATTY

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c/o Nancy H. Sims

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