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98 AUG -3 PH 4: 53

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RECORDS AND  
REPORTING

August 3, 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 (HB4785) Universal Service

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Objections to Teleport Communications Group/TCG of South Florida, Inc.'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*  
Nancy B. White (PW)

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

NBW/vf

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

DOCUMENT NUMBER-DATE

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the Cost of Basic Local Telecommunications Service, pursuant to Section 364.025, Florida Statutes ) Docket No.: 980696-TP )  
 )  
 )  
 ) Dated: August 3, 1998

**OBJECTIONS OF BELL SOUTH TELECOMMUNICATIONS, INC. TO TCG's FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

BellSouth Telecommunications, Inc. ("BellSouth"), by and through its undersigned attorneys, submits its objections to Teleport Communications Group, Inc. /TCG South Florida ("TCG") Request for Production of Documents (Nos. 1-4) ("TCG's 1st PODs"), served on July 27, 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

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respect to any of the material requested by TCG, BellSouth reserves the right to file a motion with the Commission seeking such an order.

**Production of Documents**

1. BellSouth objects to TCG's 1st POD, Nos. 3 and 4 on the grounds that these requests are premature, not reasonably calculated to lead to the discovery of admissible evidence, and is not relevant to the subject matter of this action. BellSouth objected to AT&T's 2nd PODs and FCTA's 2nd PODs on these same grounds.

Respectfully submitted this 3rd day of August, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

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\_\_\_\_\_  
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**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 3rd day of August, 1998 to the following:

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*Nancy B. White*  
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(+) Protective Agreements