

Tracy Hatch Attorney

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August 21, 1998

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

Dear Mrs. Bayo:

Re: Docket No. 980000A-SP / Docket No. 980733-TL (Discovery)

You will find enclosed for filing in the above-referenced docket an original and fifteen (15) copies of AT&T's Notices of Serving Its First Requests for Production of Documents (1.5) to GTE Florida Incorporated, BellSouth Telecommunications, Inc. and Sprint-Florida Inc. 09072-98 09073-98 09074-98

Copies of the foregoing are being served on the parties of record in accordance with the attached certificate of service.

Yours truly,

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Tracy Hatch

TH/mr APP _____ Enclosures CAF cc: Parties of Record CMU _____ CTR _____ EAG LEG _____ LIN _____ OPC _____ RECEIVED & FILED RCH _____ SEC WAS _____ OTH _

Martha Carter Brown Division of Legal Services Florida Public Service Commission 2740 Shumard Oak Blvd. Tallahassee, FL 32399-0863

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

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Fair and Reasonable Residential Basic Local Telecommunications Rates

In re: Discovery related to 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.

Special Project No. 980000A-SP

Docket No. 980733-TL (Discovery)

Filed: August 21, 1998

AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.'S NOTICE OF SERVING ITS FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (1-3) TO BELLSOUTH TELECOMMUNICATIONS, INC.

AT&T Communications of the Southern States, Inc. (hereinafter "AT&T"), by and through its undersigned a torney, hereby files this notice of service of its First Request for Production of Documents (1-3) to BellSouth Telecommunications, Inc. on this 21st day of August, 1998.

Respectfully submitted,

Tracy Hatch 101 North Monroe Street Suite 700 Tallahassee, FL 32301 (850) 425-6364 (phone) (850) 425-6361 (fax) ATTORNEY FOR AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.

DOCUMENT NUMBER-DATE

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CONTROL OF CARDINE PORTING