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General Attorney

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RECORDS AND
REPORTING

September 24, 1998

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

RE: Docket No. 980696-TP

Dear Mrs. Bayo:

Enclosed are an original and 15 copies of BellSouth Telecommunications, Inc.'s Responses and Objections to AT&T's Fifth Request for Production of Documents. Please file these documents in the captioned docket.

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 on the parties shown on the attached Certificate of Service.

Sincerely,

Mary Keyer
Mary K. Keyer

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FPSC-BUREAU OF RECORDS

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- SEC
- NAS
- OTH
-

Enclosures

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
W. J. Ellenberg (w/o enclosures)

DOCUMENT NUMBER-DATE

10622 SEP 24 88

FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the Cost)
of Basic Local Telecommunications) Docket No.: 980696-TP
Service, pursuant to Section 364.025,)
Florida Statutes)
_____) Dated: September 24, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES
AND OBJECTIONS TO AT&T'S FIFTH REQUEST FOR
PRODUCTION OF DOCUMENTS**

BellSouth Telecommunications, Inc. ("BellSouth"), hereby files pursuant to Rule 25-22.034, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, its Responses and Objections to AT&T Communications of the Southern States, Inc.'s ("AT&T") Fifth Request for Production of Documents dated September 4, 1998.

GENERAL RESPONSE

1. In any instance in which BellSouth agrees to produce documents, they will be produced at a mutually agreeable time and place. In instances in which the documentation is so voluminous that copying or transporting the documents would be burdensome, BellSouth will make the documents available for review upon BellSouth's premises in Atlanta, Georgia.

SPECIFIC RESPONSES

31. Regarding BellSouth's response to Interrogatory No. 48 from AT&T relating to function codes, please provide a copy of the complete BellSouth

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

function code manual that includes a description of the functions performed which are applicable to function code 2300 and all other function codes.

Response: The documents requested are proprietary confidential business information which will be produced subject to a Protective Agreement executed by AT&T.

32. Regarding BellSouth's response to Interrogatory No. 49a from AT&T, please provide all supporting documentation for any calculations provided showing the development of the projection of lines including the specific projection for the years 1998, 1999, and 2000.

Response: BellSouth will produce the requested documentation.

33. Regarding BellSouth's response to Interrogatory No. 49b from AT&T, please provide all supporting documentation for all assumptions provided supporting the development of specific line counts.

Response: BellSouth has no documents responsive to this request.

34. Regarding BellSouth's response to Interrogatory 49c, provide all supporting workpapers and documentation for all support asset ratio calculations provided.

Response: BellSouth will produce the requested documentation.

35. Referring to BellSouth's response to AT&T's Fourth Request for Production of Documents No. 29a, please provide:

a. All documentation concerning the outsourcing activities referenced on page 11 that result in increased costs as well as any potential future cost savings.

Response: BellSouth will produce the requested documentation.

b. On page 13, BellSouth indicates that "union wage inflation factors for years 1998, 1999, and 2000 is provided on Attachment C, page 7, of the September, 1997 Forecast of BellSouth Telecommunications Telephone Plant Indexes (TPI), RL: 97-11-002BT". Please provide a copy of this document and any other letters or memorandums that support this document.

Response: The documents requested are proprietary confidential business information which BellSouth will produce subject to a Protective Agreement executed by AT&T.

c. Regarding BST's response to Interrogatory No. 51d from AT&T, please provide all supporting documentation for the factors provided on page 14 and for the factors for 1994, 1995, and 1997.

Response: BellSouth will produce the requested documents.

Respectfully submitted this 24th day of September, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy S. White mae

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134721

**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 and Hand Delivery* this 24th day of September, 1998 to the following:

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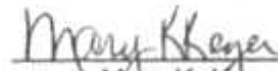
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(+) Protective Agreements