

1

ORIGINAL

Legal Department

MARY K. KEYER
General Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0729

September 30, 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. 980733-TL

Dear Mrs. Bayo:

Enclosed are an original and 15 copies of BellSouth Telecommunications, Inc.'s Objections to the Attorney General's Sixth 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 K. Keyer
Mary K. Keyer

Enclosures

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

RECEIVED & FILED
[Signature]
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER - DATE

10790 SEP 30 88

FPSC-RECORDS/REPORTING

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


made available for inspection and copying "on or before September 28, 1998." Rule 25-22.034 of the Florida Administrative Code specifies that a party "may obtain discovery through the means and in the manner provided in Rules 1.280 through 1.400, Florida Rules of Civil Procedure." Rule 1.350 of the Florida Rules of Civil Procedure provides that written responses to requests for production of documents are due "within 30 days after service of the request." When a document to which a party must respond is served by U.S. Mail, five days are added to the time within which the served party must respond. Rule 25-22.028(4), Florida Administrative Code. Although the Florida Public Service Commission has ordered that objections be filed within 10 days of service of discovery, the Commission made no such exception with regard to the time within which a party has to respond to discovery. Therefore, in accordance with the Florida Administrative Code and the Florida Rules of Civil Procedure, BellSouth will provide responses to the Attorney General's Sixth Request for Production of Documents by October 20, 1998.

Respectfully submitted this 30th day of September, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.



ROBERT G. BEATTY
NANCY B. WHITE
c/o Nancy Sims
150 South Monroe Street, #400
Tallahassee, Florida 32301
(305)347-5555



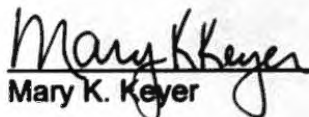
Mary Keyer
WILLIAM J. ELLENBERG II
MARY K. KEYER
675 West Peachtree Street, #4300
Atlanta, Georgia 30375
(404)335-0711

136347

CERTIFICATE OF SERVICE
Docket No. 980733-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Hand-Delivery this 30th day of September, 1998, to the following:

Michael A. Gross
Assistant Attorney General
Office of the Attorney General
PL-01 The Capitol
Tallahassee, Florida 32399-1050



Mary K. Keyer