**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.

WAS \_\_\_\_

OTH \_

DOCUMENT NUMBER-DATE

FPSC-RECORDS/REPORTING

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Discovery for Study on Fair &	)	Docket No.: 980733-TL	
Reasonable Rates and on Relationships	5)		
Among Costs and Charges Associated	)		
with Certain Telecommunications	)		
Services Provided by LECs, as	)		
Required by Chapter 98-277.	)		
	)	Filed: September 30, 199	В

## BELLSOUTH TELECOMMUNICATIONS, INC.'S OBJECTIONS TO THE ATTORNEY GENERAL'S SIXTH REQUEST FOR PRODUCTION OF DOCUMENTS TO BELLSOUTH

BellSouth Telecommunications, Inc., ("BellSouth" or "Company"), hereby files, pursuant to Rule 25-22.034 and 25-22.035, Florida Administrative Code, and Rules 1.340 and 1.280(b), Florida Rules of Civil Procedure, the following Objections to the Attorney General's Sixth Request for Production of Documents to BellSouth.

The objection stated herein is preliminary in nature and is made at this time for the purpose of complying with the ten-day requirement set forth in the procedural order issued by the Florida Public Service Commission

("Commission") in the above-captioned docket. Should additional grounds for objection be discovered as BellSouth prepares its responses to the above-referenced requests, BellSouth reserves the right to supplement, revise, or modify its objections at the time that it serves its responses.

## **OBJECTION**

BellSouth objects to the response date specified by the Attorney General in its request. The Attorney General served his request on BellSouth by U.S.

Mail on September 15, 1998, and requested that the documents requested the DATE

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

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

135347

## 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