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RECORDS AND
REPORTING

October 14, 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. 980800-TP (Supra Collocation)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Responses and Objections to Supra Telecommunications and Information Systems, Inc.'s Second Request for Production of Documents and Motion for Temporary Order, which we ask that you file 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 to the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White (re)
Nancy B. White

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU 3 _____
- CTR _____
- EAG _____
- LEG 1 _____
- LIN 3 _____
- OPC _____
- RCH _____
- SEC 1 _____
- WAS _____
- OTH _____

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

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CERTIFICATE OF SERVICE
Docket No. 980800-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express and * Hand-Delivery this 14th day of October, 1998 to the following:

Beth Keating, Esq.
Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
(850) 413-6199
(850) 413-6250

Suzanne Fannon Summerlin, Esq. *
Supra Telecommunications and
Information Systems, Inc.
1311-B Paul Russell Rd., #201
Tallahassee, Florida 32301
Tel. No. (850) 656-2288
Fax. No. (850) 656-5589

Supra Telecommunications and
Information Systems, Inc.
2620 S.W. 27th Avenue
Miami, FL 33133
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Amanda Grant
BellSouth Telecommunications, Inc.
Regulatory & External Affairs
675 West Peachtree Street, N.E.
Room 38L64
Atlanta, Georgia 30375


Nancy B. White

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Emergency Relief of Supra) Docket No. 980800-TP
 Telecommunications and Information)
 Systems, Inc., Against BellSouth)
 Telecommunications, Inc.)
 _____) Filed: October 14, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES AND
 OBJECTIONS TO SUPRA TELECOMMUNICATIONS
 AND INFORMATION SYSTEMS, INC.'S SECOND
 REQUEST FOR PRODUCTION OF DOCUMENTS AND
MOTION FOR TEMPORARY PROTECTIVE ORDER**

BellSouth Telecommunications, Inc., ("BellSouth" or "Company"), pursuant to Rules 25-22.034 and 25-22.035, Florida Administrative Code, and Rules 1.340 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following Responses, Objections and Motion for Temporary Protective Order to Supra Telecommunications and Information Systems, Inc.'s ("Supra") Second Request for Production of Documents.

GENERAL RESPONSES

BellSouth makes the following General Objections to Supra's Second Request for Production of Documents:

1. BellSouth has interpreted Supra's requests to apply to BellSouth's regulated intrastate operations in Florida and will limit its responses accordingly. To the extent that any request is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Florida Public Service Commission ("Commission"), BellSouth objects to such request to produce as irrelevant, overly broad, unduly burdensome, and oppressive.

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2. BellSouth objects to providing information to the extent that such information is already in the public record before the Commission.

3. BellSouth is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, BellSouth creates countless documents that are not subject to the Commission or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been provided in response to these discovery requests. Rather, these responses provide all of the information obtained by BellSouth after a reasonable and diligent search conducted in connection with this discovery request. BellSouth conducted a search of those files that are reasonably expected to contain the requested information. To the extent that the discovery request purports to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

MOTION FOR TEMPORARY PROTECTIVE ORDER

4. BellSouth objects to each and every request to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that Supra requests proprietary confidential business information which is not subject to the "trade secrets" privilege, BellSouth will make such information available to counsel for Supra

pursuant to an appropriate Protective Agreement and subject to any other general or specific objections contained herein.

SPECIFIC RESPONSES

5. With respect to Request No. 23, BellSouth objects to the extent BellSouth objects to a specific interrogatory. To the extent BellSouth does not object to a specific interrogatory, BellSouth will produce responsive documents in the other requests for production of documents that are in its possession, custody or control at a mutually convenient time and place subject to the Motion for Temporary Protective Order set forth above and subject to the Protective Agreement between Supra and BellSouth.

6. With respect to Request No. 24, BellSouth objects to the extent BellSouth objects to a specific interrogatory. To the extent BellSouth does not object to a specific interrogatory, BellSouth will produce responsive documents that are in its possession, custody or control at a mutually convenient time and place subject to the Motion for Temporary Protective Order set forth above and subject to the Protective Agreement between Supra and BellSouth.

7. With respect to Request No. 25, BellSouth objects to this request on the grounds that the request is overly broad, unduly burdensome, and oppressive. In addition, the request is vague and ambiguous. Moreover, BellSouth objects on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence. With respect to any collocation

that might exist between BellSouth and BellSouth Mobility, this would be a matter of public record on file with the Commission.

8. With respect to Request No. 26, BellSouth objects to this request on the grounds that the request is overly broad, unduly burdensome, and oppressive. In addition, the request is vague and ambiguous. Moreover, BellSouth objects on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence. With respect to any collocation agreement that might exist between BellSouth and BellSouth.Net, this would be a matter of public record on file with the Commission.

9. With respect to Request No. 27, BellSouth will produce responsive documents that are in its possession, custody or control at a mutually convenient time and place subject to the Motion For Temporary Protective Order set forth above and subject to the Protective Agreement between BellSouth and Supra.

10. With respect to Request No. 28, BellSouth will produce responsive documents that are in its possession, custody or control at a mutually convenient time and place subject to the Motion For Temporary Protective Order set forth above and subject to the Protective Agreement between BellSouth and Supra.

11. With respect to Request No. 29, BellSouth will produce responsive documents that are in its possession, custody or control at a mutually convenient time and place subject to the Motion For Temporary Protective Order set forth above and subject to the Protective Agreement between BellSouth and Supra.

12. With respect to Request No. 30, BellSouth objects to this request on the grounds that the request seeks customer information proprietary to BellSouth and protected by Florida Statutes. Moreover, the request is overly broad, unduly burdensome, oppressive, vague, and ambiguous and is not relevant nor reasonably calculated to lead to the discovery of admissible evidence. With respect to the two central offices that are the subject of this action, BellSouth has no responsive documents in its possession, custody or control.

13. With respect to Request No. 31, BellSouth will produce responsive documents that are in its possession, custody or control at a mutually convenient time and place subject to the Motion For Temporary Protective Order set forth above and subject to the Protective Agreement between BellSouth and Supra.

14. With respect to Request No. 32, BellSouth will produce responsive documents that are in its possession, custody or control at a mutually convenient time and place subject to the Motion For Temporary Protective Order set forth above and subject to the Protective Agreement between BellSouth and Supra.

15. With respect to Request No. 33, BellSouth will produce responsive documents that are in its possession, custody or control at a mutually convenient time and place subject to the Motion for Temporary Protective Order set forth above and subject to the Protective Agreement between Supra and BellSouth.

16. With respect to Request No. 34, BellSouth will produce responsive documents that are in its possession, custody or control at a mutually convenient

time and place subject to the Motion For Temporary Protective Order set forth above and subject to the Protective Agreement between BellSouth and Supra.

17. With respect to Request No. 35, BellSouth will produce responsive documents that are in its possession, custody or control at a mutually convenient time and place subject to the Motion For Temporary Protective Order set forth above and subject to the Protective Agreement between BellSouth and Supra.

18. With respect to Request No. 36, BellSouth will produce responsive documents that are in its possession, custody or control at a mutually convenient time and place subject to the Motion For Temporary Protective Order set forth above and subject to the Protective Agreement between BellSouth and Supra.

19. With respect to Request No. 37, BellSouth refers Supra to the prefiled direct and rebuttal testimony of the witnesses for BellSouth, the response to Supra's discovery, and the office walk-through.

20. With respect to Request No. 38, BellSouth will produce responsive documents that are in its possession, custody or control at a mutually convenient time and place subject to the Motion For Temporary Protective Order set forth above and subject to the Protective Agreement between BellSouth and Supra.

21. With respect to Request No. 39, BellSouth objects to this request on the grounds that the request seeks information that is not in the possession, custody or control of BellSouth; that the request imposes an obligation on BellSouth to respond on behalf of entities not parties to this action; that the request is not relevant and not reasonably calculated to lead to the discovery of

admissible evidence; and that the request is overly broad, unduly burdensome, and oppressive.

22. With respect to Request No. 40, BellSouth objects to this request on the grounds that the request seeks information that is not in the possession, custody or control of BellSouth; that the request imposes an obligation on BellSouth to respond on behalf of entities not parties to this action; that the request is not relevant and not reasonably calculated to lead to the discovery of admissible evidence; and that the request is overly broad, unduly burdensome, and oppressive.

23. With respect to Request No. 41, BellSouth will produce responsive documents that are in its possession, custody or control at a mutually convenient time and place subject to the Motion For Temporary Protective Order set forth above and subject to the Protective Agreement between BellSouth and Supra.

24. With respect to Request No. 42, BellSouth refers Supra to BellSouth's response to Request No. 41 of Supra's Second Request for Production of Documents.

25. With respect to Request No. 43, BellSouth refers Supra to the prefiled testimony of Wayne Mayes. BellSouth will also produce responsive documents that are in its possession, custody or control at a mutually convenient time and place subject to the Motion For Temporary Protective Order set forth above and subject to the Protective Agreement between BellSouth and Supra.

26. With respect to Request No. 44, BellSouth will produce responsive documents that are in its possession, custody or control at a mutually convenient time and place subject to the Motion For Temporary Protective Order set forth above and subject to the Protective Agreement between BellSouth and Supra.

27. With respect to Request No. 45, BellSouth refers Supra to BellSouth's response to Request No. 44 of Supra's Second Request for Production of Documents.

28. With respect to Request No. 46, BellSouth will produce responsive documents that are in its possession, custody or control at a mutually convenient time and place subject to the Motion For Temporary Protective Order set forth above and subject to the Protective Agreement between BellSouth and Supra.

29. With respect to Request No. 47, BellSouth objects to this request on the grounds that the request is not relevant, nor reasonably calculated to lead to the discovery of admissible evidence. In addition, the request is overly broad, unduly burdensome, and oppressive.

30. With respect to Request No. 48, BellSouth objects to this request on the grounds that the request is overly broad, unduly burdensome, and oppressive. In addition, the request is vague and ambiguous. Moreover, BellSouth objects on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence.

31. With respect to Request No. 49, BellSouth will produce responsive documents that are in its possession, custody or control at a mutually convenient

time and place subject to the Motion For Temporary Protective Order set forth above and subject to the Protective Agreement between BellSouth and Supra.

32. With respect to Request No. 50, BellSouth will produce responsive documents that are in its possession, custody or control at a mutually convenient time and place subject to the Motion For Temporary Protective Order set forth above and subject to the Protective Agreement between BellSouth and Supra.

33. With respect to Request No. 51, BellSouth refers Supra to BellSouth's response to Request No. 35 of Supra's Second Request for Production of Documents.

34. With respect to Request No. 52, BellSouth objects on the grounds that virtual collocation is not an issue in this proceeding. Therefore, the request is not relevant and is not reasonably calculated to lead to the discovery of admissible evidence.

35. With respect to Request No. 53, BellSouth will produce responsive documents that are in its possession, custody or control at a mutually convenient time and place subject to the Motion For Temporary Protective Order set forth above and subject to the Protective Agreement between BellSouth and Supra.

36. With respect to Request No. 54, BellSouth will produce responsive documents that are in its possession, custody or control at a mutually convenient time and place subject to the Motion For Temporary Protective Order set forth above and subject to the Protective Agreement between BellSouth and Supra.

37. With respect to Request No. 55, BellSouth will produce responsive documents that are in its possession, custody or control at a mutually convenient time and place subject to the Motion For Temporary Protective Order set forth above and subject to the Protective Agreement between BellSouth and Supra.

38. With respect to Request No. 56, BellSouth will produce responsive documents that are in its possession, custody or control at a mutually convenient time and place subject to the Motion For Temporary Protective Order set forth above and subject to the Protective Agreement between BellSouth and Supra.

Respectfully submitted this 14th day of October, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (KR)

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