

RECEIVED-EPSC Legal Department

MARY K. KEYER
General Attorney

99 OCT 28 PM 4:45

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

RECORDS AND
REPORTING

October 28, 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. 980733-TL

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Responses and Objections to Staff's Second Request for Production of Documents. Please file them in the captioned matter.

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,

Mary K. Keyer
Mary K. Keyer

cmu-2
AFA
RRR-2
Sec-1

Enclosures

cc: All parties of record
A. M. Lombardo
R. G. Beatty
William J. Ellenberg II (w/o enclosures)

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A.V.A.
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
12065 OCT 28 8
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Discovery for Study on Fair & Reasonable Rates and on Relationships Among Costs and Charges Associated with Certain Telecommunications Services Provided by LECs, as Required by Chapter 98-277.)
_____)

Docket No.: 980733-TL

Filed: October 28, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES
AND OBJECTIONS TO STAFF'S SECOND
REQUEST FOR PRODUCTION OF DOCUMENTS**

BellSouth Telecommunications, Inc. ("BellSouth"), files pursuant to Rule 25-22.034, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, its Responses and Objections to the Staff of the Florida Public Service Commission's ("Staff") Second Request for Production of Documents dated September 23, 1998, and incorrectly identified as Staff's First Request for Production of Documents.

GENERAL RESPONSES

1. With regard to the Staff's definition of "documents", BellSouth has made a diligent, good faith attempt to locate documents responsive to the scope of the Staff's individual requests for documents.

2. BellSouth does not believe it was the Staff's intent to require BellSouth to produce again the same documents previously produced in other dockets, but to the extent it does, BellSouth objects on the basis that such a

request would be unduly burdensome, oppressive, and unnecessary, and for these reasons is prohibited.

SPECIFIC RESPONSES

The following Specific Responses are given subject to the above-stated General Responses and Objections.

4. On August 7, 1998, in CC Docket No. 96-45, In the matter of Federal-State Joint Board on Universal Service, the FCC requested certain revenue information from non-rural local exchange carriers and holding companies. Responses are due to the FCC on or before October 6, 1998. Please provide both paper and electronic copies of the completed spreadsheets.

Response: BellSouth objects to this request as it requests documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. The information requested by the FCC is revenue information to be used in determining a revenue benchmark. Such a determination is not at issue in this case. Therefore, the information requested is irrelevant. Without waiving this objection, BellSouth will produce, subject to BellSouth's Notice of Intent filed October 28, 1998, the requested documents, some of which contain confidential proprietary business information.

TECHNICAL
RESPECTFULLY SUBMITTED THIS 28TH DAY OF OCTOBER, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy S. White MKK

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Mary Keyer

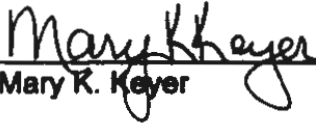
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CERTIFICATE OF SERVICE
Docket No. 980733-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via hand delivery this 28th day of October, 1998, to the following:

Beth Keating
Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850



Mary R. Keyer