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RECORDS AND  
REPORTING

May 6, 1999

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. 981012-TL

Dear Ms. Bayó:

Enclosed are an original and 15 copies of BellSouth Telecommunications, Inc.'s Responses and Objections to TCG's Third Request for Production of Documents and Motion for Protective Order. Please file this document 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.

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FPSC-BUREAU OF RECORDS

Sincerely,

*J. Phillip Carver*  
(Bw)

J. Phillip Carver

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APP \_\_\_\_\_  
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WAW \_\_\_\_\_  
OTH \_\_\_\_\_

Enclosures

cc: All parties of record  
M. M. Criser, III  
N. B. White  
William J. Ellenberg II (w/o enclosures)

DOCUMENT NUMBER-DATE

05770 MAY-6 99

FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: BellSouth Telecommunications, Inc.'s Petition for temporary waiver of physical collocation requirement set forth in the 1996 Telecommunications Act and the FCC's First Report and Order, for the North Dade Golden Glades Central Office	)	
	)	
	)	Docket No. 981012-TL
	)	
	)	
	)	Filed: May 6, 1999
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**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES AND  
OBJECTIONS TO TELEPORT COMMUNICATIONS GROUP INC./  
TCG SOUTH FLORIDA'S THIRD REQUEST FOR PRODUCTION  
OF DOCUMENTS AND MOTION FOR 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 Protective Order to Teleport Communications Group Inc./TCG South Florida's ("TCG") Third Request for Production of Documents.

**GENERAL RESPONSES**

BellSouth makes the following General Objections to TCG's Third Request for Production of Documents:

1. BellSouth has interpreted TCG'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 Commission, BellSouth

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FPSC-RECORDS/REPORTING

objects to such request to produce as irrelevant, overly broad, unduly burdensome, and oppressive.

2. BellSouth objects to providing information to the extent that such information is already in the public record before the Florida Public Service 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 Florida Public Service 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 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. Further, Section 364.24, Florida Statutes prohibits the disclosure of certain customer account information except as

required by “subpoena, court order, other process of court, or as otherwise allowed by law.” Accordingly, BellSouth objects to producing any information, the production of which is prohibited by this statute. To the extent that TCG has requested proprietary confidential business information that is not subject to the “trade secrets” privilege or Section 364.24, BellSouth will make this information available to be reviewed by counsel for TCG at a mutually agreeable time and place, subject to an appropriate Protective Agreement and subject to any other general or specific objections contained herein.

### **SPECIFIC RESPONSES**

5. In response to TCG’s Request to Produce No. 3, this request is for information provided in response to Intermedia Communications Inc.’s (“Intermedia”) First Request for Production of Documents, to which BellSouth has previously responded. BellSouth hereby responds to this request by incorporating by reference its responses and objections to the above-noted request of Intermedia.

6. In response to TCG’s Request to Produce No. 4, this request is for information provided in response to Sprint Communications Company Limited’s (“Sprint”) First Request for Production of Documents, to which BellSouth has previously responded. BellSouth hereby responds to this request by incorporating by reference its responses and objections to the above-noted request of Sprint.

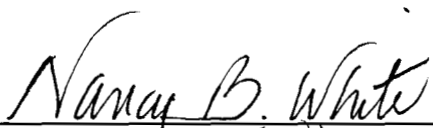
7. In response to TCG’s Request to Produce No. 5, this request is for information provided in response to ACI Corp.’s (“ACI”) First Request for

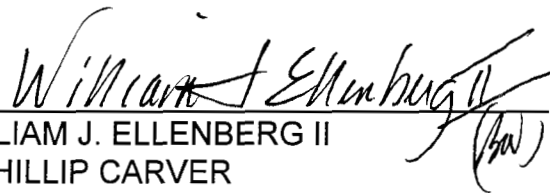
Production of Documents, to which BellSouth has previously responded.

BellSouth hereby responds to this request by incorporating by reference its responses and objections to the above-noted request of ACI.

Respectfully submitted this 6th day of May, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
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**CERTIFICATE OF SERVICE**  
**Docket Nos. 980946-TL, 980947-TL, 980948-TL, 981011-TL**  
**981012-TL, and 981250-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U.S. Mail this 7th day of May, 1999 to the following:

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\* Protective Agreements

  
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