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J. PHILLIP CARVER  
General Attorney

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BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0710

RECORDS AND  
REPORTING

July 2, 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. 990149-TP

Dear Ms. Bayó:

Enclosed are an original and 15 copies of BellSouth Telecommunications, Inc.'s Responses and Objections to Staff's Fourth Request for Production of Documents. 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.

Sincerely,

*J. Phillip Carver (KR)*

J. Phillip Carver

RECEIVED & FILED  
*[Signature]*  
FPSC BUREAU OF RECORDS

Enclosures

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

- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU 1
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 1
- MAS 3
- OPC \_\_\_\_\_
- PRR \_\_\_\_\_
- SEC 1
- WAW \_\_\_\_\_
- OTR \_\_\_\_\_

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**CERTIFICATE OF SERVICE**  
**Docket No. 990149-TP**

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

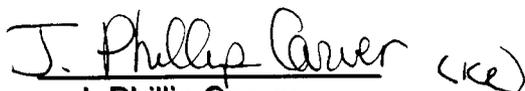
U.S. Mail this 2nd day of July, 1999 to the following:

Lee Fordham, Esq.  
Florida Public Service Commission  
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Tallahassee, Florida 32399-0850

Mr. James P. Campbell  
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Atty. for MediaOne

Susan Keesen  
Dick Karre  
MediaOne Group, Inc.  
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Tel. (303) 858-3566  
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J. Phillip Carver (ke)  
J. Phillip Carver

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by MediaOne Florida )  
Telecommunications, Inc. for )  
Arbitration of an interconnection ) Docket No. 990149-TP  
Agreement with BellSouth )  
Telecommunications, Inc. pursuant )  
to Section 252(b) of the ) Filed: July 2, 1999  
Telecommunications Act of 1996 )  
\_\_\_\_\_ )

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES  
AND OBJECTIONS TO STAFF'S FOURTH 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") Fourth Request for Production of Documents dated June 7, 1999.

**GENERAL RESPONSES**

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

2. BellSouth objects to Staff's definition of "BellSouth," "you" and "your." It appears that Staff, through its definition of these words, is attempting to obtain discovery of information in the possession, custody, or control of entities that are not parties to this docket. Requests for Production may only be directed to parties, and any attempt by Staff to obtain discovery from non-parties should

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be prohibited. See Rule 1.340, Florida Rules of Civil Procedure; Broward v. Kerr, 454 So. 2d 1068 (4th D.C.A. 1984).

3. BellSouth does not believe it was 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.

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

#### **SPECIFIC RESPONSES**

5. In response to Request to Produce No. 11, BellSouth states that the requested information is contained in the documentation provided in response to Production of Document Request No. 14.

6. In response to Request to Produce No. 12, BellSouth BellSouth states that the requested information is contained in the documentation provided in response to Production of Document Request No. 14.

7. In response to Request to Produce No. 13, BellSouth will produce the requested documents at a mutually agreeable time and place.

8. In response to Request to Produce No. 14, BellSouth states that this request is for both "documents" and "workpapers." BellSouth will provide the documents at a mutually agreeable time and place. Since these documents are proprietary, a Notice of Intent to Request Confidential Classification has been

filed on this day. Pages 31 to 42 of the Cost Study filed in this docket as DDC-1 contains the requested workpapers.

9. In response to Request to Produce No. 15, BellSouth states that this request is for both “documents” and “workpapers.” BellSouth has no responsive documents in its possession, custody or control. Pages 31 to 42 of the Cost Study filed in this docket as DDC-1 contains the requested workpapers.

10. In response to Request to Produce No. 16, BellSouth states that the requested information is contained in the documentation provided in response to Production of Document Request No. 14.

11. In response to Request to Produce No. 17, BellSouth states that the requested information is contained in the documentation provided in response to Production of Document Request No. 14.

12. In response to Request to Produce No. 18, BellSouth has no documents in its possession, custody or control.

13. In response to Request to Produce No. 19, BellSouth states that the requested information is contained in the documentation provided in response to Production of Document Request No. 14.

14. In response to Request to Produce No. 20, BellSouth will produce the requested documents at a mutually agreeable time and place.

Respectfully submitted this 2nd day of July, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

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