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99 DEC -3 PM 4:37

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RECORDS AND
REPORTING

December 3, 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. 990649-TP

Dear Ms. Bayó:

Enclosed are an original and 15 copies of BellSouth Telecommunications, Inc.'s Responses and Objections to Staff's Third 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. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

J. Phillip Carver (KR)
J. Phillip Carver

AFA _____
APP _____
CAF _____
CMD 1 Enclosures
CTR _____
EAG _____ cc: All parties of record
LEG 2 M. M. Criser, III
MAS 5 N. B. White
OPC _____ R. D. Lackey
PAI _____
SEC 1
WAW _____
OTH _____

DOCUMENT NUMBER-DATE

14801 DEC-3 99

FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE
Docket No. 990649-TP**

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

U.S. Mail this 3rd day of December, 1999 to the following:

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J. Phillip Carver (ke)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into)
pricing of unbundled network)
elements)
_____)

Docket No. 990649-TP

Filed: December 3, 1999

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES
AND OBJECTIONS TO STAFF'S THIRD 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") Third Request for Production of Documents dated November 8, 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 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.

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

DOCUMENT NUMBER-DATE

14801 DEC-3 99

FPSC-RECORDS/REPORTING

SPECIFIC RESPONSES

4. In response to Request to Produce No. 10, BellSouth has no responsive documents in its possession, custody or control.

Respectfully submitted this 3rd day of December, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

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