

ORIGINAL

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RECORDS AND
REPORTING

April 10, 2001

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. 000121-TP (OSS)

Dear Ms. Bayó:

Today, BellSouth Telecommunications, Inc. served its Response and Objections to the Commission Staff's First Request for Production of Documents and First Set of Interrogatories, dated March 21, 2001.

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

J. Phillip Carver (KA)

Enclosures

cc: All parties of record
Marshall M. Criser, III
Nancy B. White
R. Douglas Lackey

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CERTIFICATE OF SERVICE
Docket No. 000121-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
U.S. Mail and Hand Delivery(*) this 10th day of April, 2001 to the following:

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the)	Docket No. 000121-TP
Establishment of Operations Support)	
Systems Permanent Performance)	
Measures for Incumbent Local Exchange)	
Telecommunications Companies)	Dated: April 10, 2001
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**BELLSOUTH'S RESPONSE AND OBJECTIONS TO STAFF'S
FIRST 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 Response and Objections to the Staff of the Florida Public Service Commission's ("Staff") First Request for Production of Documents dated March 21, 2001.

GENERAL OBJECTIONS

BellSouth makes the following General Objections to Staff's First Request for Production of Documents.

1. BellSouth objects to the requests to the extent that such requests seek to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such requests are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. BellSouth has interpreted Staff's requests to apply to BellSouth's regulated intrastate operations in Florida and will limit its Answers 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 objects to such request to produce as irrelevant, overly broad, unduly burdensome, and oppressive.

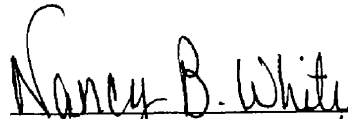
3. BellSouth objects to each and every request and instruction to the extent that such request or instruction calls for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

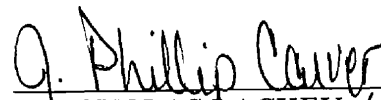
4. BellSouth is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, BellSouth creates countless documents that are not subject to Florida Public Service Commission or FCC retention of records requirements. These documents 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. Staff requests herein documents that have previously been produced to other parties in response to previous discovery. Without limiting any of the foregoing objections, BellSouth incorporates herein by reference its objections to that previous discovery.

SPECIFIC RESPONSE

5. In response to Staff's Request to Produce No. 1, BellSouth will produce the requested documents. These documents are proprietary and are being produced subject to a Notice of Intent that is being filed on this day.

Respectfully submitted this 10th day of April, 2000.


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