

ORIGINAL

Legal Department

NANCY B. WHITE
Assistant General Counsel-Florida

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305)347-5558

April 6, 1998

Mrs. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

RE: Docket No. 971399-TP (Marketing Restrictions)

Dear Mrs. Bayo:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response and Objections to MCI Telecommunications Corporation's First Request for Production of Documents (Ncs. 1-12) and Motion for Protective Order, which we ask that you file in the captioned docket.

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 on the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White

Nancy B. White

(Pw)

ACK _____
AFA _____
APP _____
CAF _____
CMU Quicker
CTR _____
EAG _____
LEG 1
LIN 5
OPC _____
RCH _____
SEC 1
WAS _____
OTH _____

Enclosures

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
W. J. Ellenberg

DOCUMENT NUMBER-DATE

03963 APR-6 88

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of BellSouth) Docket No.: 971399-TP
 Telecommunications, Inc. to Lift)
 Marketing Restrictions Imposed)
 By Order No. PSC-96-1569-FOF-TP)
 _____) Filed: April 6, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'s RESPONSE
 AND OBJECTION TO MCI's FIRST REQUEST FOR PRODUCTION
 OF DOCUMENTS AND MOTION FOR PROTECTIVE ORDER**

BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), hereby files, pursuant to Rule 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 Response and Objections to MCI Telecommunications Corporation's ("MCI") First Request for Production of Documents to BellSouth dated March 6, 1998.

GENERAL RESPONSES

BellSouth makes the following General Responses to MCI's First Request for Production of Documents.

1. BellSouth has interpreted MCI's requests to apply to BellSouth's regulated intrastate operations in Florida and limits 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 as irrelevant, overly broad, unduly burdensome, and oppressive.

DOCUMENT NUMBER-DATE

03963 APR -6 88

FPSC-RECORDS/REPORTING

2. BellSouth objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

MOTION FOR PROTECTIVE ORDER

3. BellSouth objects to each and every request to the extent that the information requested constitute "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that MCI's requests request proprietary confidential business information which is not subject to the "trade secrets" privilege, BellSouth will make such information available to counsel for MCI pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

RESPONSES TO SPECIFIC RESPONSES

Subject to, and without waiver of, the foregoing general responses, BellSouth enters the following specific responses with respect to MCI's requests:

4. With respect to Request Nos. 1, 2, 3, 4, 5, and 6, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place subject to the Motion for Temporary Protective Order set forth above.

5. With respect to Request Nos. 7, 8, 9, 10, and 11, BellSouth has no responsive documents in its possession, custody, or control.

6. With respect to Request No. 12, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually

convenient time and place subject to the Motion for Temporary Protective Order set forth above.

Respectfully submitted this 6th day of April, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty

ROBERT G. BEATTY

NANCY B. WHITE

c/o Nancy Sims

150 South Monroe Street, #400

Tallahassee, Florida 32301

(305)347-5555

William J. Ellenbergh II

WILLIAM J. ELLENBERG II

675 West Peachtree Street, #4300

Atlanta, Georgia 30375

(404)335-0711

CERTIFICATE OF SERVICE
Docket No. 971399-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served
by *Hand-Delivery and U.S. Mail this 6th day of April, 1998 to the following:

Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Thomas K. Bond
MCI Telecommunications Corp.
780 Johnson Ferry Road
Suite 700
Atlanta, GA 30342

Richard D. Melson *
Hopping Green Sams & Smith
123 South Calhoun Street
Tallahassee, FL 32314
Atty. for MCI

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves & McGlothlin,
Davidson, Rief & Bakas
117 South Gadsden Street
Tallahassee, Florida 32301
Attys. for FIXCA
Attys. for FCCA
(850) 222-2525

Marsha Rule
AT&T Communications of the
Southern States, Inc.
101 North Monroe Street
Suite 700
Tallahassee, FL 32301

Brian Sulmonetti, President
Florida Competitive Carriers Assoc.
1515 South Federal Highway
Suite 400
Boca Raton, FL 33432

Peter M. Dunbar, Esq.
Barbara D. Auger, Esq.
Pennington, Moore, Wilkinson
& Dunbar, P.A.
P.O. Box 10095
Tallahassee, FL 32302
Tel. No. (850) 222-3533
Fax. No. (850) 222-2126

Carolyn Marek
V.P. - Regulatory Affairs
S.E. Region
Time Warner Comm.
P.O. Box 210706
Nashville, Tennessee 37221
Tel No. (615) 673-1191
Fax No. (615) 673-1192

Nancy B. White
Nancy B. White (Bw)