

NANCY B. WHITE
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BellSouth Telecommunications, Inc.
150 South Monroe Street
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(404) 335-0710

September 30, 1996

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

RE: Docket No. 950558-TP

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response and Objections to Staff's First Request for Production of Documents and Notice of Intent to Request Confidential Classification. Please file these documents 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 (SL)

Nancy B. White

Enclosures

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

This Notice of Intent was filed with Confidential Document No. 10507-16. The document has been placed in the confidential files pending receipt of a request for confidential treatment.

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- LIN _____
- OPC _____
- RCH _____
- SEC _____
- WAS _____
- OTH _____

RECEIVED & FILED

FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

10506 SEP 30 96

FPSC-RECORDS/REPORTING

ORIGINAL
FILE COPY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Florida)	
Interexchange Carriers)	
Association, and AT&T)	
Communications of the Southern)	Docket No. 960658-TP
Southern States, Inc. against)	
BellSouth Telecommunications,)	Filed: September 30, 1996
)	

BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSE AND
OBJECTIONS TO STAFF'S FIRST REQUEST FOR PRODUCTION
OF DOCUMENTS AND NOTICE OF INTENT TO
REQUEST CONFIDENTIAL CLASSIFICATION

COMES NOW BellSouth Telecommunications, Inc., ("BellSouth" or "Company"), and (1) 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 Florida Public Service Commission Staff's ("Staff") First Request for Production of Documents dated August 29, 1996 and (2) pursuant to Rule 25-22.006, Florida Administrative Code, its Notice of Intent to Request Confidential Classification.

NOTICE OF INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION

Some of the documents that will be produced for the Staff in response to its First Request for Production of Documents contain information which is exempted from public disclosure pursuant to §§ 119.07 and 364.183, Florida Statutes. Specifically, some of the documents contain, among other things, cost study information. This information is included as proprietary confidential business information under § 364.183, Florida Statutes and Rule 25-22.006, Florida Administrative Code.

DOCUMENT NUMBER-DATE
10506 SEP 30 96
FPSC-RECORDS/REPORTING

Because these documents contain exempt information, BellSouth is filing this Notice of Intent to Request Confidential Classification, pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, in order to allow the Staff access to these documents without delay. The original of this Notice has been filed with the Division of Records and Reporting, and a copy has been served on the division requesting this information.

GENERAL RESPONSE AND OBJECTIONS

1. With regard to Staff's definition of "document" or "documents", 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 docket, 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.

SPECIFIC RESPONSES

1. With respect to Request No. 1, BellSouth will produce representative responsive documents that are in its possession, custody, or control at a mutually convenient time and place subject to the Notice of Intent filed herein.

2. With respect to Request No. 2, BellSouth will produce representative responsive documents that are in its possession, custody, or control at a mutually convenient time and place subject to the Notice of Interest filed herein.

3. With respect to Request No. 3, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

4. With respect to Request No. 4, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

5. With respect to Request No. 5, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

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

Respectfully submitted this 30th day of September, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (B2)

ROBERT G. BEATTY

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c/o Nancy Sims

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CERTIFICATE OF SERVICE

Docket No. 930330-TP

Docket No. 960658-TP

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this 30th day of September, 1996 to:

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