

BENNETT L. ROSS General Attorney

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December 9, 1997

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

RE: Docket No. 960833-TP; 960846-TP; 960916-TP

Dear Ms. Bayo:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response and Objections to Staff's Third Request for Production of Documents. 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.

Bennett L Ross (KR)

Sincerely,

Bennett L. Ross

Enclosures

cc: All Parties of Record

A. M. Lombardo

R. G. Beatty

W. J. Ellenberg

12584 DEC-95

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Docket No. 960833-TP In re: Petitions by AT&T Communications of the Southern Docket No. 960846-TP States, Inc., and MCI Telecommunications Corporation, MCI Metro Access Transmission Services, Inc., for arbitration of certain terms and conditions of a proposed agreement with BellSouth Telecommunications, Inc. concerning interconnection and resale under the Telecommunications Act of 1996 Docket No. 960757-TP In the matter of MFS Communications Company, Inc. Petition for Arbitration Pursuant to 47 U.S.C. § 252(b) of Interconnection Rates, Terms, and Conditions with BellSouth Telecommunications. Inc. In the Matter of Docket No. 960916-TP Petition by American Communications Services, Inc. and American Communications Services of Jacksonville, Inc. for Arbitration with BellSouth Telecommunications, Inc. pursuant to the Telecommunications Act of 1996 In re: Petition by MCI Metro Access Docket No. 971140-TP Transmission Services, Inc., to Set Non-Recurring Charges for Combination of Network Elements to Set Non-Recurring Charges for Combination of Network Elements with BellSouth Telecommunications, Inc. Filed: December 9, 1997

12584 DEC-95

FPSC-RECORDS/REPORTING

BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSE 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 Response and Objections to Staff's Third Request for Production of Documents, dated November 24, 1997.

1. With respect to Request Nos. 45-50, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place subject to BellSouth's Notice of Intent to Request Specified Confidential Classification.

Respectfully submitted this 9th day of December, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

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CERTIFICATE OF SERVICE DOCKET NOS. 960833-TP/960846-TP/960757-TP/960916-TP/971140-TP

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

Federal Express this 9th day of December, 1997 to the following:

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