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RECORDS AND
REPORTING

August 28, 1998

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. 980696-TP

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Responses and Objections to AT&T's Third Request for Production of Documents. Please file these documents 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 (cc)

J. Phillip Carver

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FPS-C-BUREAU OF RECORDS

Enclosures

cc: All parties of record
A. M. Lombardo
R. G. Beatty
William J. Ellenberg II (w/o enclosures)

- ACK
- AFA 2
- APP
- CAF
- CRU King
- CTR
- EAG
- LEG 2
- LIN 5
- OPC
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- SEC 1
- WAS
- OTH

DOCUMENT NUMBER-DATE

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FPS-C-RECORDS/REPORTING

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the Cost)
of Basic Local Telecommunications) Docket No.: 980696-TP
Service, pursuant to Section 364.025,)
Florida Statutes)
_____) Dated: August 28, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES
AND OBJECTIONS TO AT&T'S THIRD REQUEST FOR
PRODUCTION OF DOCUMENTS**

BellSouth Telecommunications, Inc. ("BellSouth"), hereby files pursuant to Rule 25-22.034, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, its Responses and Objections to AT&T Communications of the Southern States, Inc.'s ("AT&T") Third Request for Production of Documents dated August 5, 1998.

GENERAL RESPONSE

1. In any instance in which BellSouth agrees to produce documents, they will be produced at a mutually agreeable time and place. In instances in which the documentation is so voluminous that copying or transporting the documents would be burdensome, BellSouth will make the documents available for review upon BellSouth's premises in Atlanta, Georgia.

SPECIFIC RESPONSES

1. In response to AT&T's Request to Produce Nos. 18, 19 and 23, BellSouth states that the requested information is both voluminous (the

DOCUMENT NUMBER-DATE
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FPSC-RECORDS/REPORTING

equivalent of thousands of pages in paper form) and proprietary. Moreover, the requested information has previously been produced to AT&T in the context of Docket Nos. 960833-TP, 960846-TP, 960757-TP, and 971140-TP. BellSouth objects to producing these voluminous documents a second time. To the extent proprietary agreements between BellSouth and AT&T executed in the above-referenced dockets limit AT&T's use of the requested information to those dockets, BellSouth is willing to modify the agreements to allow the information to be used in the subject docket as well.

2. In response to AT&T's Request to Produce Nos. 20, 21, 26, and 27, BellSouth states that the documents responsive to this request are proprietary information and are voluminous. This information is contained in contracts with switch vendors that include a provision stating that BellSouth may not release this information to third parties. BellSouth has negotiated a modification to these contracts whereby this information may be produced in response to discovery requests provided that the party seeking production executes a proprietary agreement with terms and conditions that have been approved by the vendors. These terms and conditions were included in proprietary agreements executed by AT&T in the context of universal service dockets in other states, including Kentucky, Louisiana and Mississippi. Subject to the foregoing, BellSouth will make the responsive information available for review, upon the execution of a vendor-approval proprietary agreement, at BellSouth's offices in Atlanta, Georgia.

3. In response to AT&T's Request to Produce No. 22, BellSouth states that it has no documents in its possession, custody or control that are responsive to this request.

4. In response to AT&T's Request to Produce No. 24, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

5. In response to AT&T's Request to Produce No. 25, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

6. In response to AT&T's Request to Produce No. 28, BellSouth agrees to produce the requested documents at a mutually agreeable time and place.

Respectfully submitted this 28th day of August, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (cc)

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c/o Nancy H. Sims

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**CERTIFICATE OF SERVICE
DOCKET NO. 980696-TP (HB4785)**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express and *Hand Delivery this 28th day of August, 1998 to the following:

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