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Legal Department

MARY K. KEYER
General Attorney

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BellSouth Telecommunications, Inc.
150 South Monroe Street
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Tallahassee, Florida 32301
(404) 335-0729

RECORDS AND
REPORTING

October 12, 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. 980733-TL

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Responses and Objections to Citizens' Fifth Request for Production of Documents, which we served today. Please file them 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.

ACK _____
AFA 1
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CMU _____
CTR _____
EAG _____
LEG 2
LIN _____
OPC _____
RCH 1
SEC 1
WAS _____
OTH _____

Sincerely,

Mary K. Keyer

Enclosures

cc: All parties of record

A. M. Lombardo

R. G. Beatty

William J. Ellenberg II (w/o enclosures)

DOCUMENT NUMBER-DATE

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EPSC-RECORDS/REPORTING

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Discovery for Study on Fair & Reasonable Rates and on Relationships Among Costs and Charges Associated with Certain Telecommunications Services Provided by LECs, as Required by Chapter 98-277.

Docket No.: 980733-TL

Filed: October 12, 1998

BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES AND OBJECTIONS TO CITIZENS' FIFTH 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 Responses and Objections to the Florida's Citizens ("Citizens") Fifth Request for Production of Documents dated September 11, 1998.

GENERAL RESPONSES

1. BellSouth incorporates by reference its General Objections to Citizens' Fifth Request for Production of Documents filed September 11, 1998, as if they were fully set forth herein.

2. BellSouth objects to Citizens' proposed "Instruction" relating to details of privileged documents. To the extent a document responsive to any of the requests is subject to an applicable privilege, some of the information requested by Citizens would be similarly privileged and therefore not subject to discovery. Notwithstanding this objection, BellSouth agrees to identify any documents withheld on the basis of privilege.

3. With regard to Citizens' definition of "document" or "documents", BellSouth has made a diligent, good faith attempt to locate documents responsive to the scope of Citizens' individual requests for documents.

4. BellSouth objects to Citizens' definition of "you" and "your." It appears that Citizens, through its definition of these words, is attempting to obtain discovery of information in the possession, custody, or control of entities that are not parties to this docket. Requests for Production may only be directed to parties, and any attempt by Citizens to obtain discovery from non-parties should be prohibited. See Rule 1.340, Florida Rules of Civil Procedure; Broward v. Kerr, 454 So. 2d 1068 (4th D.C.A. 1984).

5. BellSouth does not believe it was Citizens' intent to require BellSouth to produce again the same documents previously produced in other dockets, 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.

SPECIFIC RESPONSES

The following Specific Responses are given subject to the above-stated General Responses and Objections.

13. As its response to Citizens' First Set of Interrogatories to BellSouth, Item No. 1 (Citizens' Interrogatory I-1), BellSouth stated that it has undertaken embedded cost studies for several services. As its response to Citizens' Third Request for Production of Documents, No. 6, BellSouth stated that complete

copies of the embedded cost studies, including all inputs, algorithms and results, were to be found in "BellSouth's filing in 980000A-SP." If the embedded cost information requested has not been provided, please provide a complete copy of the embedded cost studies identified in Citizens' Interrogatory I-1, along with all inputs, algorithms and results, as initially requested.

Response: See BellSouth's answer to Interrogatory 18.

14. As described in the BellSouth's response to the Division of Communications Interrogatory No. 1, BellSouth utilized the series of computerized cost study modules in preparing the cost studies provided in the response to that request. Please provide a working electronic copy of each of the computerized cost study modules identified in the response to the Division of Communications interrogatory on diskette or CD ROM, including all data files relied upon or generated which would be needed to replicate all intermediate and final calculations.

Response: The requested information has been provided by BellSouth in response to Request 12 of Citizens' Fourth Request for Production of Documents.

15. If not already provided in response to another request, please provide the documentation and operating instructions to permit an experienced analyst to run and duplicate the intermediate and final cost study calculations.

Response: See BellSouth's response to Request 14.

16. With regard to the response to Citizens' Interrogatory No. 1-9, please state whether BST Network has any data available with regard to the number of local and toll calls at the various busy hours identified in parts a-d of the request. If yes, please provide.

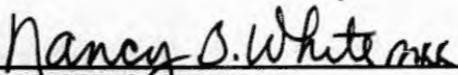
Response: This request is a duplicate of Interrogatory 23. See BellSouth's answer to Request 23.

17. With regard to the response to Citizens' Interrogatory 1-16, please state whether BellSouth derives any additional revenues from residential customers which are not reflected in the response. If yes, please identify the sources and the average per customer amounts. Include a workpaper similar to that provided in the initial response.

Response: This response is a duplicate of Interrogatory 24. See BellSouth's answer to Interrogatory 24.

Respectfully submitted this 12th day of September, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.


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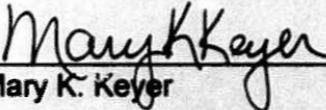
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CERTIFICATE OF SERVICE
Docket No. 980733-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Hand-Delivery this 12th day of October, 1998, to the following:

Charles J. Beck
Deputy Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400



Mary K. Keyer