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Legal Department

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BellSouth Telecommunications, Inc.
150 South Monroe Street
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RECORDS AND
REPORTING

May 25, 1999

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. 990149-TP

Dear Ms. Bayó:

Enclosed are an original and 15 copies of BellSouth Telecommunications, Inc.'s Objections to MediaOne Florida Telecommunications, Inc.'s First Set of Interrogatories and First Request for Production of Documents. Please file this document 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.

Sincerely,

J. Phillip Carver (ke)

J. Phillip Carver

- AFA _____
- APP _____
- CAF _____
- CMU 1 _____
- CTR _____
- EAG _____
- LEG 1 _____
- MAS 2 _____
- OPC _____
- RRR _____
- SEC 1 _____
- WAW _____
- OTH _____

Enclosures

cc: All parties of record
M. M. Criser, III
N. B. White
William J. Ellenberg II (w/o enclosures)

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FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE
Docket No. 990149-TP**

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

U.S. Mail this 25th day of May, 1999 to the following:

Beth Keating, Esq.
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

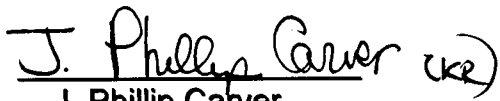
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J. Phillip Carver

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by MediaOne Florida)	
Telecommunications, Inc. for)	
Arbitration of an interconnection)	Docket No. 990149-TP
Agreement with BellSouth)	
Telecommunications, Inc. pursuant)	
to Section 252(b) of the)	Filed: May 25, 1999
Telecommunications Act of 1996)	
_____)	

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
 OBJECTIONS TO MEDIAONE FLORIDA TELECOMMUNICATIONS, INC.'S
 FIRST SET OF INTERROGATORIES AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

BellSouth Telecommunications, Inc., ("BellSouth" or "Company"), hereby files, pursuant to Rule 25-22.034, Florida Administrative Code, and Rule 1.280, Florida Rules of Civil Procedure and Order No. PSC-99-0476-PCO-TL, the following Objections to MediaOne Florida Telecommunications, Inc.'s ("MediaOne") First Set of Interrogatories and First Request for Production of Documents to BellSouth Telecommunications Inc. ("BellSouth").

The objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the 10-day requirement set forth in the procedural order issued by the Florida Public Service Commission ("Commission") in the above-captioned docket. Should additional grounds for objection be discovered as BellSouth prepares its answers to the above-referenced Request for Production of Documents, BellSouth reserves the right to supplement, revise, or modify its objections at the time it serves its answers.

Moreover, should BellSouth determine that a Protective Order is necessary with

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respect to any of the requested information, BellSouth reserves the right to file a motion with the Commission seeking such an order at the time that it serves its answers.

GENERAL OBJECTIONS

BellSouth makes the following General Objections to MediaOne's First Set of Interrogatories and First Request for Production of Documents which will be incorporated by reference into BellSouth's specific answers when they are served on MediaOne.

1. BellSouth objects to the subject discovery to the extent it seeks to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such requests are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. BellSouth objects to the subject discovery to the extent that it is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission. BellSouth objects to such requests for production of documents as being irrelevant, overly broad, unduly burdensome, and oppressive.

3. BellSouth objects to each and every request for production of documents and interrogatories and instruction to the extent that such requests, instructions, and interrogatories call for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. BellSouth objects to each and every discovery request insofar as it is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these requests. Any answers provided by BellSouth in response to this discovery will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth objects to the subject discovery insofar as it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

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

7. BellSouth objects to each and every discovery request to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. BellSouth also objects to each and every request for production that would require the disclosure of customer specific information, the disclosure of which is prohibited by Section 364.24, Florida Statutes. To the extent that MediaOne requests proprietary information that is not subject to the "trade secrets" privilege or to Florida Statutes Section 364.24, BellSouth will make such information available to MediaOne at a mutually agreeable time and place upon the execution of a confidentiality agreement.

8. BellSouth objects to MediaOne's discovery requests, instructions and definitions, insofar as they seek to impose obligations on BellSouth that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

9. BellSouth objects to each and every discovery request, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

10. BellSouth is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, BellSouth creates countless documents that are not subject to Florida Public Service Commission or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been identified in response to these requests for production of documents. BellSouth will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the requests for production of documents purport to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

SPECIFIC OBJECTIONS

11. As noted above in Paragraph 7, BellSouth objects to producing any customer specific, proprietary information that cannot be disclosed without violating Section 364.24, Florida Statutes. BellSouth notes that Interrogatory Numbers 7 and 8 and Request to Produce Number 8 appear to directly seek

such information. Thus, without limiting in any way its general objection, BellSouth objects specifically to these interrogatories and request.

12. As noted above in Paragraph 2, BellSouth objects to any discovery that seeks to obtain information that does not relate to BellSouth's operations in Florida. Interrogatories 13 and 16, as well as Request to Produce Number 4 expressly seek such information. Thus, without limiting in any way its general objection, BellSouth objects specifically to these interrogatories and request.

Respectfully submitted this 25th day of May, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

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