

NANCY B. WHITE
Assistant General Counsel-Florida

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5558

July 23, 1997

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

Re: Docket Nos. **970172-TP** and 970281-TL

Dear Mrs. Bayo:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response and Objections to Staff's First Request for Production of Documents (No. 1), dated July 3, 1997, which we ask that you file 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.

- ACK 3
- AFA 3
- APP
- CAF
- CMU
- CTR
- EAG
- LEG 1
- LIN 5
- ORD
- RC
- SEC 1
- WAS
- OTH

Enclosures

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

Sincerely,

Nancy B. White (as)
Nancy B. White

RECEIVED & FILED
DIVISION OF RECORDS

DOCUMENT NUMBER-DATE
07432 JUL 23 97
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

FILED
JUL 23 1997
TALLAHASSEE

In re: Petition by MCI)
Telecommunications Corporation)
for an order requiring BellSouth)
Telecommunications, Inc. to remove)
its deregulated payphone investment)
and associated expenses from its)
intrastate operations and reduce)
the Carrier Common Line rate)
element of its intrastate switched)
access charges by approximately)
\$36.5 million as required by the)
Federal Telecommunications Act)
of 1996.)

Docket No. 970172-TP

Filed: July 23, 1997

In re: Petition by MCI)
Telecommunications Corporation)
for an order requiring GTE Florida)
Incorporated to remove its)
deregulated payphone investment)
and associated expenses from its)
intrastate operations and reduce)
the Carrier Common Line rate)
element of its intrastate switched)
access charges by approximately)
\$9.6 million as required by the)
Federal Telecommunications Act)
of 1996.)

Docket No. 970173-TP

In re: Establishment of)
intrastate implementation)
requirement governing)
federally mandated)
deregulation of local)
exchange company payphones.)

Docket No. 970281-TL

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSE AND
OBJECTIONS
TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

COMES NOW BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), and files pursuant to Rule 25-22.034, Florida Administrative Code, and Rules 1.280(c) and 1.350 of the Florida Rules of Civil Procedure, its Response and Objections to Staff's First Request for Production of Documents (No. 1), dated July 3, 1997.

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

SPECIFIC RESPONSES

4. With respect to Request No. 1, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

Respectfully submitted this 23rd day of July, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (per)

ROBERT G. BEATTY

NANCY B. WHITE

c/o Nancy Sims

150 South Monroe Street, #400

Tallahassee, Florida 32301

(305)347-5555

William J. Ellenberg II (per)

WILLIAM J. ELLENBERG II

J. PHILLIP CARVER

675 West Peachtree Street, #4300

Atlanta, Georgia 30375

(404)335-0711

**CERTIFICATE OF SERVICE
DOCKET NO. 970281-TL and 970172-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express and * Hand Delivery this 23rd day of July, 1997 to the following:

Richard D. Melson, Esq.
Hopping, Green, Sams & Smith, P.A.
123 South Calhoun Street
P.O. Box 6526
Tallahassee, FL 32314
Tel. No. (904) 425-2313
Fax. No. (904) 224-8551

Michael J. Henry, Esq.
MCI Telecommunications Corporation
780 Johnson Ferry Road, Suite 700
Atlanta, GA 30342

Monica Barone, Esq.
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Ms. Beverly Y. Menard
GTE Florida Incorporated
106 East College Avenue, Suite 1440
Tallahassee, FL 32301-7704

Mr. F. B. "Ben" Poag
Sprint-Florida, Inc.
1313 Blairstone Road
Tallahassee, FL 32302
(904) 681-3100

Ms. Harriet Eudy
ALLTEL Florida, Inc.
206 White Street
Live Oak, FL 32060

Ms. Laurie A. Maffett
Frontier Communications
of the South, Inc.
180 S. Clinton Avenue
Rochester, N.Y. 14646-0400

Mr. Bill Thomas
St. Joe Communications
502 5th Street
Port St. Joe, FL 32456
1-800-441-4406

Mr. Robert M. Post, Jr.
Indiantown Telephone System, Inc.
16001 S.W. Market Street
Indiantown, FL 34956
(407) 597-3113

Ms. Lynne G. Brewer
Northeast Florida Telephone
Company, Inc.
130 North 4th Street
Macclenny, FL 32063-0485
(904) 259-2261

Mr. Thomas M. McCabe
Quincy Telephone Company
107 West Franklin Street
Quincy, FL 32351-2310
(850) 875-2111

Mr. John H. Vaughan
St. Joseph Telephone Company
502 5th Street
Port St. Joe, FL 32456
(904) 229-7231

Ms. Lynn B. Hall
Vista-United Telecommunications
3100 Bonnet Creek Road
Lake Buena Vista, FL 32830
(407) 827-2210

Charles J. Rehwinkel
General Attorney
Sprint-Florida, Incorporated
1313 Blair Stone Rd.
Tallahassee, FL 32301

Angela B. Green
Florida Public Telecomm. Assn., Inc.
125 South Gadsden Street
Suite 200
Tallahassee, FL 32301-1525
Tel. No. (904) 222-5050
Fax. No. (904) 222-1355

Will Cox, Esq. *
Florida Public Service Commission
Staff Counsel
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Tracy Hatch, Esq.
AT&T
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
(904) 425-6364


Nancy B. White