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98 AUG -5 PM 4: 32

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RECORDS AND
REPORTING

August 5, 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 Second 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.

RECEIVED & FILED

Sincerely,

FPSC-BUREAU OF RECORDS

Mary K. Keyer (use)

Mary K. Keyer

Enclosures

cc: All parties of record

A. M. Lombardo

R. G. Beatty

William J. Ellenberg II (w/o enclosures)

- ACK
- AFA 4
- APP
- CAF
- CMU King
- CTR
- EAG
- LEG 2
- LIN 5
- OPC
- RCH
- SEC 1
- WAS
- OTH

DOCUMENT NUMBER-DATE

08310 AUG-58

FPSC-RECORDS/REPORTING

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 5, 1998

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

COMES NOW, BellSouth Telecommunications, Inc. ("BellSouth"), and 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") Second Request for Production of Documents dated July 16, 1998.

GENERAL RESPONSES

1. BellSouth has made a diligent, good faith attempt to locate documents as defined in AT&T's request which are responsive to the scope of AT&T's individual requests for documents.

2. BellSouth objects to AT&T's definitions of "you," "your," and "BellSouth." It appears that AT&T, 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 AT&T 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).

3. BellSouth does not believe it was AT&T'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.

4. In any instance in which BellSouth agrees to produce documents, they will be produced at a mutually agreeable time and place.

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

SPECIFIC RESPONSES

17. If not already provided in response to AT&T's First Request for Production of Documents in this proceeding, please provide copies of the following BellSouth documents:

(a) DAML Deployment Directive RL: 97-03-012BT and any subsequent issue or related documentation.

(b) Loop Technology Deployment Directive RL: 96-09-026BT and any subsequent issue or related documentation.

(c) Fixed and Variable Cost Structures 97-06-014BT and any subsequent issue or related documentation.

Response: The documents requested constitute proprietary confidential business information which BellSouth will produce subject to the Protective Agreement executed by AT&T on July 30, 1998.

Respectfully submitted this 5th day of August, 1998.

PELLSOUTH TELECOMMUNICATIONS, INC.

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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 this 5th day of August, 1998 to the following:

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(+) Protective Agreements