

ORIGINAL

Legal Department

MARY K. KEYER
General Attorney

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

September 21, 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 AT&T's First Request for Production of Documents, which we served today. Please file them in the captioned matter.

A copy of this letter is enclosed and has been served on the parties shown on the attached Certificate of Service. Please mark it to indicate that the original was filed and return the copy to me.

ACK _____
AFA 2
APP _____
CAF _____
CMU _____
CTR _____
EAG _____ Enclosures
LEG 2
LIN _____ cc: All parties of record
OPC _____ A. M. Lombardo
RCH 2 R. G. Beatty
SEC 1 William J. Ellenberg II (w/o enclosures)
WAS _____
OTH _____

Sincerely,

Mary K. Keyer (MK)

Mary K. Keyer

RECEIVED & FILED

[Signature]
FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

10404 SEP 21 98

FPSC-RECORDS/REPORTING

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: September 21, 1998

BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES AND OBJECTIONS TO AT&T'S FIRST 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 AT&T Communications of the Southern States, Inc. ("AT&T") First Request for Production of Documents dated August 21, 1998.

GENERAL RESPONSES

1. With regard to AT&T's definition of "document", BellSouth has made a diligent, good faith attempt to locate documents responsive to the scope of AT&T's individual requests for documents.

2. BellSouth objects to AT&T's definition of "BellSouth," "you" and "your." 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. The following Specific Responses are given subject to the above-stated General Responses and Objections.

SPECIFIC RESPONSES

1. Please produce all cost studies and supporting documentation filed with the Florida Public Service Commission by BellSouth in support of the cost of basic local service.

Response: BellSouth will produce, subject to a Protective Agreement executed by AT&T, the requested information, some of which is confidential proprietary business information.

2. Please produce all documentation filed by BellSouth in response to the Florida Public Service Commission Staff's June 19, 1998, data requests regarding fair and reasonable rates.

Response: BellSouth will produce, subject to a Protective Agreement executed by AT&T, the documentation it filed in response to Staff's June 19, 1998, data requests.

3. Please produce all documents responsive to the Office of Public Counsel's First Set of Requests for Production of Documents to BellSouth filed June 19, 1998, and to the Office of Public Counsel's Second Set of Requests for Production of Documents to BellSouth filed June 25, 1998.

Response: The information contained in the documents requested constitutes confidential proprietary business information, which BellSouth will make available for review by AT&T at a mutually agreeable time and place subject to a Protective Agreement executed by AT&T and for certain documents subject to the following.

With respect to the documents requested in Data Requests 13 and 14 in Tim Devlin's letter dated June 19, 1998, to all local exchange companies regarding 980000A-SP, undocketed special project, fair and reasonable rates, BellSouth has certain materials that it has provided to bond rating agencies, including Standard & Poor's and Moody's, on its own behalf, but it does not have possession, custody or control of any such documents that might have been prepared by BellSouth Corporation or any of its other subsidiaries.

The materials BellSouth has that may be responsive to those particular requests constitute confidential proprietary business information, some of which is so sensitive that any individual who reviews the information is deemed to be an "insider" for purposes of the Securities and Exchange Commission rules.

With this in mind, and assuming that counsel for AT&T who wish to review this material are willing to review the materials with the understanding that doing

so may make them "insiders" for purposes of the Securities and Exchange Commission, BellSouth will produce for review the requested materials that are in its possession, custody and control at a mutually agreed upon time and place, subject to the material being treated as proprietary confidential business information. BellSouth will file Notices and Requests for Confidential Classification at the appropriate time.

Respectfully submitted this 21st day of September, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (RW)

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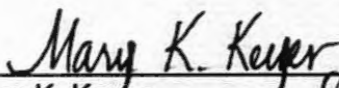
William J. Ellenberg II (RW)

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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 21st day of September, 1998, to the following:

Tracy Hatch
AT&T
Suite 700
101 North Monroe Street
Tallahassee, FL 32301



Mary K. Keyer (sw)