

ORIGINAL

Legal Department

MARY K. KEYER
General Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0729

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RECORDS AND
REPORTING

January 15, 1999

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

RE: Docket No. 981052-TP

Dear Mrs. Bayo:

Enclosed are an original and 15 copies of the corrected captioned page for BellSouth Telecommunications, Inc.'s Response and Objections to TCCF's First Request for Production of Documents. The caption of the original filed pleading stated it was TCCF's Fifth Request which was incorrect. Please file this document 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.

Sincerely,

Mary K. Keyer (ke)
Mary K. Keyer

RECEIVED & FILED

~~FPSC BUREAU OF RECORDS~~

Enclosures

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU Stavins
- CTR _____
- EAG _____
- LEG 2
- LIN 3
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

cc: All Parties of Record
M. M. Criser, III
N. B. White
W. J. Ellenberg (w/o enclosures)

DOCUMENT NUMBER - DATE

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition by Telephone Company)
of Central Florida, Inc. for resolution of) Docket No. 981052-TP
Items under dispute in resale agreement)
with BellSouth Telecommunications, Inc.) Filed: January 13, 1999

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES
AND OBJECTIONS TO TCCF'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 The Telephone Company of Central Florida, Inc.'s ("TCCF") First Request for Production of Documents dated December 14, 1998.

GENERAL RESPONSES

1. BellSouth objects to TCCF's 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 TCCF 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.

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

CERTIFICATE OF SERVICE
Docket No. 981052-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via U.S. Mail this 15th day of January, 1999, to the following:

Andrea K. Welch
Telephone Company of Central
Florida, Inc.
3599 W. Lake Mary Boulevard
Suite E
Lake Mary, Florida 32746
(407) 328-5002

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman,
Arnold & Steen, P.A.
117 South Gadsden Street
Tallahassee, FL 32301
(850) 222-2525
Attys. for TCCF

Mary K. Keyer (kk)
Mary K. Keyer