



BellSouth Telecommunications, Inc.

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EXECUTIVE SECRETARY

November 8, 2000

VIA HAND DELIVERY

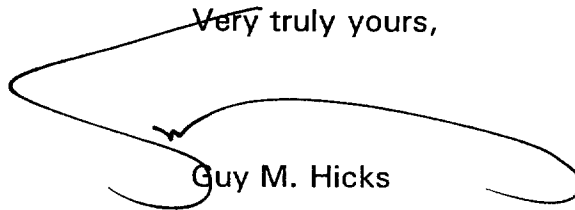
Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: *All Telephone Companies Tariff Filings Regarding Reclassification Of
Pay Telephone Service As Required By Federal Communications
Commission (FCC) Docket 96-128
Docket No. 97-00409*

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth Public Communications, Inc.'s ("BSPC") Responses to Staff's First Data Requests Nos. 1 through 4 dated October 27, 2000. During the recent oral argument, BellSouth Telecommunications, Inc. ("BellSouth") was asked to obtain this information from BSPC. BellSouth's response to the Staff's Data Request No. 5 is also enclosed. Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,



Guy M. Hicks

GMH/jem

Enclosure

BellSouth Public Communications, Inc.
Tennessee Regulatory Authority
Docket No. 97-00409
Staff's First Data Requests
October 27, 2000
Item No. 1
Page 1 of 1

REQUEST: Please provide audited financial statements for the calendar years ended December 31, 1997, 1998, 1999 and year-to-date 2000 for BellSouth Public Communications, Inc. Note: If audited financial statements have not been prepared provide unaudited financial statements.

RESPONSE: BellSouth objects to this data request. The subject matter of this docket has devolved to one question: Do the PTAS and SmartLine® rates charged by BellSouth Telecommunications meet the FCC's "new services test?" The audited (or unaudited) financial statements of BellSouth Public Communications, a subsidiary of BellSouth Telecommunications have absolutely no relevance to the issue remaining in this docket.

Moreover, the data is highly proprietary, and the direct competitors of BellSouth Public Communications in Tennessee are the members of the Tennessee Payphone Owners Association ("TPOA"). Nor could the data requested by the Staff even be used by the TPOA in this docket, as there is no further argument or briefing contemplated by the procedural schedule.

Nevertheless, and without waiving the foregoing objections, BellSouth is willing to make the requested information available for review (to the extent the requested information exists) by the Tennessee Regulatory Authority Staff pursuant to an appropriate proprietary agreement at a mutually convenient time and location.

BellSouth Public Communications, Inc.
Tennessee Regulatory Authority
Docket No. 97-00409
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October 27, 2000
Item No. 2
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REQUEST: Provide financial statements for BellSouth Public Communications, Inc. Tennessee payphone operations for the years ended 1997, 1998, 1999, and year-to-date 2000.

RESPONSE: See response to Item No. 1.

BellSouth Public Communications, Inc.
Tennessee Regulatory Authority
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REQUEST: Provide the number of payphones in Tennessee served by BellSouth Public Communications, Inc. as of December 31, 1997, 1998, 1999, and October 1, 2000.

RESPONSE: Dec. 1997 = 17,413; 1998 = 17,284; 1999 = 16,094; Oct. 1, 2000 = 15,308

BellSouth Telecommunications, Inc.
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REQUEST: Is the cost study information presented in the testimony of D. Daonne Caldwell filed on September 15, 2000, based on jurisdictionally separated or unseparated costs?

RESPONSE: The referenced cost study is based on unseparated costs.

CERTIFICATE OF SERVICE

I hereby certify that on November 8, 2000, a copy of the foregoing document was served on the parties of record, as follows:

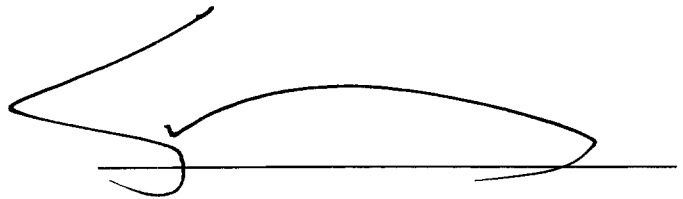
☐ Hand	Cynthia Kinser, Esquire
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A handwritten signature in black ink, appearing to read "L. Vincent Williams", written over a horizontal line.