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November 12, 2002

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**VIA HAND DELIVERY**

Blanca S. Bayo, Director  
Division of Records and Reporting  
Betty Easley Conference Center  
4075 Esplanade Way  
Tallahassee, Florida 32399-0870

Re: Docket Nos.: 020119-TP and 020578-TP

Dear Ms. Bayo:

On behalf of Florida Competitive Carriers Association, enclosed for filing and distribution are the original and 15 copies of the following:

- ▶ Florida Competitive Carriers Association's Objections to BellSouth Telecommunications, Inc.'s Second Request for Production of Documents (Nos. 1-2)

Please acknowledge receipt of the above on the extra copy and return the stamped copy to me. Thank you for your assistance.

Sincerely,

Joseph A. McGlothlin

JAM/mls  
Enclosure

AUS	_____
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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for expedited review and cancellation of BellSouth Telecommunications, Inc.'s Key Customer promotional tariffs and for investigation of BellSouth's promotional pricing and marketing practices, by Florida Digital Network, Inc.

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Docket No.: 020119-TP

In Re: Petition for expedited review and cancellation Of BellSouth Telecommunications, Inc.'s Key Customer promotional tariffs by Florida Competitive Carriers Association.

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Docket No.: 020578-TP

Filed: November 12, 2002

**FLORIDA COMPETITIVE CARRIERS ASSOCIATIONS**  
**OBJECTIONS TO BELLSOUTH TELECOMMUNICATIONS, INC.'S**  
**SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1 - 2)**

Pursuant to Rule 28-106.206, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, the Florida Partnership Competitive Carriers Association ("FCCA") Objects to BellSouth Telecommunications, Inc.'s ("BellSouth") Second Requests for Production of Documents (Nos. 1-2) and states as follows:

**General Objections**

1. FCCA objects to any request that calls for the production of documents protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law, whether such privilege or protection appears at the time the response is first made to these requests or is later determined to be applicable based on the discovery of documents, investigation or analysis. FCCA in no way intends to waive any such privilege or protection.


2. In certain circumstances, FCCA may determine upon investigation and analysis that documents that respond to certain requests to which objections are not otherwise asserted are

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confidential and proprietary and should not be produced or should be produced only under an appropriate confidentiality agreement and protective order. By agreeing to produce documents in response to this request, FCCA is not waiving its right to insist upon appropriate protection of confidentiality by means of a confidentiality agreement and protective order. FCCA hereby asserts its right to require such protection of any and all documents that may qualify for protection under the Florida Rules of Civil Procedure and other applicable statutes, rules and legal principles.

3. FCCA further objects to these requests and any definitions or instructions that purport to expand FCCA's obligations under applicable law. FCCA will comply with applicable law.

4. FCCA objects to any request that requires the production of "all" or "each" responsive document, as it cannot guarantee, even after a good faith and reasonably diligent attempt, that "all" or "each" responsive document will be found.

  
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Attorneys for the Florida Competitive  
Carriers Association

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the Florida Competitive Carriers Association's Objections to BellSouth's Second Requests for Production of Documents (Nos. 1-2) to Florida Competitive Carriers Association has been furnished by (\*)hand delivery, (\*\*)e-mail or by U.S. Mail on this 28th day of October 2002 to the following:

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