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ORIGINAL
FILE COPY

December 18, 1995

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

RE: Docket No. 950985B-TP

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Objections to Metropolitan Fiber Systems of Florida, Inc.'s First Set of Interrogatories. Please file these documents 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,

Nancy B White (st)

Nancy B. White

- ACK
- AFA
- APP
- CAF
- CMU
- CTR
- EAG
- LEG
- LIN
- OPC
- RCH
- SEC
- WAS
- OTH

Enclosures

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
R. D. Lackey

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DOCUMENT NUMBER-DATE

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CERTIFICATE OF SERVICE

Docket No. 950985A-TP

Docket No. 950985B-TP

Docket No. 950985C-TP

Docket No. 950985D-TP

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by Federal Express this 18th day of December, 1995 to:

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of petition(s))
to establish nondiscriminatory)
rates, terms, and conditions for)
interconnection involving local) Docket No. 950985B-TP (MFS)
exchange companies and alternative)
local exchange companies pursuant)
to Section 364.162, Florida) Filed: December 18, 1995
Statutes)
_____)

BELLSOUTH TELECOMMUNICATIONS, INC.'S OBJECTIONS TO
METROPOLITAN FIBER SYSTEMS OF FLORIDA, INC.'S
FIRST SET OF INTERROGATORIES

COMES NOW BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), pursuant to Rules 25-22.034 and 25-22.035, Florida Administrative Code, and Rules 1.340 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following Objections to Metropolitan Fiber Systems of Florida, Inc. ("MFS") First Set of Interrogatories to BellSouth.

The Objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the ten-day requirement set forth in Order No. PSC-95-1421-PCO-TP issued by the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced docket on November 22, 1995. Should additional grounds for objection be discovered as BellSouth prepares its Answers to the above-referenced set of interrogatories, BellSouth reserves the right to supplement, revise, or modify its objections at the time that it serves its Answers on MFS. Moreover, should BellSouth determine that a Protective Order is necessary with respect to any of the material requested by MFS, BellSouth reserves the right to file a motion

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with the Commission seeking such an order at the time that it serves its Answers on MFS.

GENERAL OBJECTIONS

BellSouth makes the following General Objections to MFS's First Set of Interrogatories which will be incorporated by reference into BellSouth's specific responses when its Answers are served on MFS.

1. BellSouth objects to the interrogatories to the extent that such interrogatories seek to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such requests are overly broad, is unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. BellSouth has interpreted MFS's interrogatories to apply to BellSouth's regulated intrastate operations in Florida and will limit its Answers accordingly. To the extent that any interrogatory is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission, BellSouth objects to such interrogatory as irrelevant, overly broad, is unduly burdensome, and oppressive.

3. BellSouth objects to each and every interrogatory and instruction to the extent that such interrogatory or instruction calls for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. BellSouth objects to each and every interrogatory insofar as the request is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these interrogatories. Any Answers provided by BellSouth in response to MFS's interrogatories will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth objects to each and every interrogatory insofar as the request is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. BellSouth will attempt to note each instance where this objection applies.

6. BellSouth objects to MFS's discovery requests insofar as they seek to impose obligations on BellSouth which exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

7. BellSouth objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

8. BellSouth objects to each and every interrogatory, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. BellSouth objects to each and every interrogatory to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that MFS's interrogatories request

proprietary confidential business information which is not subject to the "trade secrets" privilege, BellSouth will make such information available to counsel for MFS pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

10. BellSouth objects to these interrogatories to the extent that the number of interrogatories grossly exceeds the limit of 30, including subparts, imposed by Rule 1.340(a) Florida Rules of Civil Procedure and Rule 25-22.034, Florida Administrative Code. MFS has served upon BellSouth over 200 interrogatories, including subparts.

11. BellSouth objects to these interrogatories to the extent that they seek documents, rather than information, and are, therefore, not the proper subject for an Interrogatory.

12. BellSouth objects to these interrogatories to the extent that they seek information that is not maintained in the format requested.

13. BellSouth objects to these interrogatories to the extent that they seek information in the nature of market research. BellSouth should not be required to provide to a competitor information which BellSouth has compiled or which BellSouth has paid to have compiled and allow a competitor to have the benefit of such information.

OBJECTIONS TO SPECIFIC INTERROGATORIES

Subject to, and without waiver of, the foregoing general objections, BellSouth enters the following specific objections with respect to MFS's interrogatories:

Interrogatory No. 9: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that the request is vague, overly broad, is unduly burdensome, and is not calculated to lead to the discovery of admissible evidence in that it seeks the last cost study filed with the Commission, but does not specify for what service. Moreover, BellSouth objects on the basis that the request seeks highly sensitive competitive business information.

Interrogatory No. 11: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that the request seeks specifics regarding the cost study sought in Interrogatory No. 9. BellSouth objects on the grounds that the request is vague, overly broad, is unduly burdensome, is not reasonably calculated to lead to the discovery of admissible evidence and seeks highly sensitive competitive business information.

Interrogatory No. 21: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that it seeks information pertaining to Lifeline Telephone Assistance Service, which information is not relevant to the subject of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 24: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that the request is not relevant to the subject of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 25: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that the request is not relevant to the subject of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 26: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that the request is not relevant to the subject of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 31: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that it seeks information which is not in the possession, custody, or control of BellSouth.

Interrogatory No. 32: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory with respect to directory publishing on the grounds that it seeks information which is not in the possession, custody or control of BellSouth.

Interrogatory No. 35: Pursuant to the General Objections stated above, BellSouth specifically objects to this

interrogatory on the grounds that the request is not relevant to the subject of this docket, is unduly burdensome, is oppressive, is not reasonably calculated to lead to the discovery of admissible evidence and seeks highly sensitive competitive business information. Moreover, BellSouth objects on the grounds that the request seeks information that constitutes market research.

Interrogatory No. 36: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that the request is not relevant to the subject of this docket, is unduly burdensome, is oppressive, is not reasonably calculated to lead to the discovery of admissible evidence and seeks highly sensitive competitive business information. Moreover, BellSouth objects on the grounds that the request seeks information that constitutes market research.

Interrogatory No. 37: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that the request is not relevant to the subject of this docket, is unduly burdensome, is oppressive, is not reasonably calculated to lead to the discovery of admissible evidence and seeks highly sensitive competitive business information. Moreover, BellSouth objects on the grounds that the request seeks information that constitutes market research.

Interrogatory No. 38: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that the request is not relevant to the subject of this docket, is unduly burdensome, is oppressive, is not reasonably calculated to lead to the discovery of admissible evidence and seeks highly sensitive competitive business information. Moreover, BellSouth objects on the grounds that the request seeks information that constitutes market research.

Interrogatory No. 39: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that the request is not relevant to the subject of this docket, is unduly burdensome, is oppressive, is not reasonably calculated to lead to the discovery of admissible evidence and seeks highly sensitive competitive business information. Moreover, BellSouth objects on the grounds that the request seeks information that constitutes market research.

Interrogatory No. 40: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that the request is not relevant to the subject of this docket, is unduly burdensome, is oppressive, is not reasonably calculated to lead to the discovery of admissible evidence and seeks highly sensitive competitive business information. Moreover, BellSouth objects on the grounds

that the request seeks information that constitutes market research.

Interrogatory No. 40(c): Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and oppressive in that it seeks contracts, agreements, and quotes, whether or not reduced to writing. BellSouth enters into a multitude of contracts and agreements, both concerning Florida operations and its other eight states. This information is located throughout the nine state region, as well as at several locations within each state.

Interrogatory No. 41(a): Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and oppressive in that it seeks contracts, agreements, and quotes, whether or not reduced to writing. BellSouth enters into a multitude of contracts and agreements, both concerning Florida operations and its other eight states. This information is located throughout the nine state region, as well as at several locations within each state.

Interrogatory No. 41(d): Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and oppressive in that it seeks contracts, agreements, and quotes, whether or not reduced to writing. BellSouth enters into a multitude of contracts and agreements,

both concerning Florida operations and its other eight states. This information is located throughout the nine state region, as well as at several locations within each state.

Interrogatory No. 42(a): Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and oppressive in that it seeks contracts, agreements, and quotes, whether or not reduced to writing. BellSouth enters into a multitude of contracts and agreements, both concerning Florida operations and its other eight states. This information is located throughout the nine state region, as well as at several locations within each state.

Interrogatory No. 45(b): Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and oppressive in that it seeks plans or schedules concerning the replacement of BellSouth's facilities. Such documents are maintained in over 15 different locations. Moreover, BellSouth objects to this interrogatory on the grounds that the request seeks highly sensitive competitive business information which BellSouth would be unable to obtain from MFS.

Interrogatory No. 46: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that the request seeks information that constitutes market research and that is not maintained in the format requested.

Interrogatory No. 47: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that the request is not relevant to the subject of this docket, is unduly burdensome, is oppressive, is not reasonably calculated to lead to the discovery of admissible evidence and seeks highly sensitive competitive business information.

Interrogatory No. 48: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that the request is not relevant to the subject of this docket, is unduly burdensome, is oppressive, is not reasonably calculated to lead to the discovery of admissible evidence and seeks highly sensitive competitive business information.

Interrogatory No. 49: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that it seeks information pertaining to Lifeline Telephone Assistance Service, which information is not relevant to the subject of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 50: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that it seeks information pertaining to Lifeline Telephone Assistance Service, which information is not relevant to the subject of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 51: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that it seeks information pertaining to Lifeline Telephone Assistance Service, which information is not relevant to the subject of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 52(b): Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that the request is not relevant to the subject of this docket, is unduly burdensome, is oppressive, is not reasonably calculated to lead to the discovery of admissible evidence and seeks highly sensitive competitive business information.

Interrogatory No. 53: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that the request is not relevant to the subject of this docket, is unduly burdensome, is oppressive, is not reasonably calculated to lead to the discovery of admissible evidence and seeks highly sensitive competitive business information.

Interrogatory No. 55: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that the request is not relevant to the subject of this docket, is unduly burdensome, is oppressive, is not reasonably calculated to lead to the discovery of admissible evidence and seeks highly sensitive competitive

business information and is not maintained in the format requested.

Interrogatory No. 58: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that the request is not relevant to the subject of this docket, is unduly burdensome, is oppressive, is not reasonably calculated to lead to the discovery of admissible evidence and seeks highly sensitive competitive business information.

Interrogatory No. 59: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that the request is not relevant to the subject of this docket, is unduly burdensome, is oppressive, is not reasonably calculated to lead to the discovery of admissible evidence and seeks highly sensitive competitive business information and is not maintained in the format requested.

Interrogatory No. 64: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that the request is not relevant to the subject of this docket, is unduly burdensome, is oppressive, is not reasonably calculated to lead to the discovery of admissible evidence and seeks highly sensitive competitive business information.

Interrogatory No. 65: Pursuant to the General Objections stated above, BellSouth specifically objects to this

interrogatory on the grounds that the request is not relevant to the subject of this docket, is unduly burdensome, is oppressive, is not reasonably calculated to lead to the discovery of admissible evidence and seeks highly sensitive competitive business information.

Interrogatory No. 69(b): Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and oppressive in that it seeks contracts, agreements, and quotes, whether or not reduced to writing. BellSouth enters into a multitude of contracts and agreements, both concerning Florida operations and its other eight states. This information is located throughout the nine state region, as well as at several locations within each state.

Interrogatory No. 70: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that it seeks information which is not in the possession, custody, or control of BellSouth.

Interrogatory No. 71: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and oppressive in that it seeks contracts, agreements, and quotes, whether or not reduced to writing. BellSouth enters into a multitude of contracts and agreements, both concerning Florida operations and its other eight states.

This information is located throughout the nine state region, as well as at several locations within each state.

Interrogatory No. 74: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that the request is not relevant to the subject of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 75: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and oppressive in that it seeks contracts, agreements, and quotes, whether or not reduced to writing. BellSouth enters into a multitude of contracts and agreements, both concerning Florida operations and its other eight states. This information is located throughout the nine state region, as well as at several locations within each state.

Interrogatory No. 76: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that the information sought is not maintained by BellSouth for the length of time requested.

Interrogatory No. 77: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that the request is not relevant to the subject of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Interrogatory No. 78: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that it seeks information which is not in the possession, custody, or control of BellSouth.

Interrogatory No. 84: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and oppressive in that it seeks contracts, agreements, and quotes, whether or not reduced to writing. BellSouth enters into a multitude of contracts and agreements, both concerning Florida operations and its other eight states. This information is located throughout the nine state region, as well as at several locations within each state.

Interrogatory No. 87: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that it requests Extended Area Service traffic studies and therefore, the request is overly broad, unduly burdensome and oppressive. Extended Area Service traffic studies are voluminous and may be viewed in Atlanta and Birmingham, the locations at which they are maintained.

Interrogatory No. 89: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that it seeks information which is not in the possession, custody, or control of BellSouth.

Interrogatory No. 90: Pursuant to the General Objections stated above, BellSouth specifically objects to this

interrogatory on the grounds that it seeks information which is not in the possession, custody, or control of BellSouth.

Interrogatory No. 91: Pursuant to the General Objections stated above, BellSouth specifically objects to this interrogatory on the grounds that the request is not relevant to the subject of this docket, is unduly burdensome, is oppressive, is not reasonably calculated to lead to the discovery of admissible evidence and seeks highly sensitive competitive business information.

Respectfully submitted this 18th day of December, 1995.

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