

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Resolution of petition(s))
to establish nondiscriminatory)
rates, terms, and conditions for)
interconnection involving local)
exchange companies and alternative)
local exchange companies pursuant)
to Section 364.162, Florida)
Statutes)

Docket No. 950985-TP (Teleport)
Docket No. 950985A-TP (Continental)
Docket No. 950985B-TP (MFS)
Docket No. 950985C-TP (MCImetro)
Docket No. 950985D-TP (Time Warner)

Served: January 4, 1996

**AT&T'S RESPONSES, OBJECTIONS, AND MOTION FOR PROTECTIVE
ORDER WITH RESPECT TO BELL SOUTH TELECOMMUNICATIONS, INC.'S
REVISED FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

AT&T Communications of the Southern States, Inc. (hereinafter "AT&T"), pursuant to Rules 25-22.034 and 25-22.035, Florida Administrative Code and Rules 1.350 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following Responses, Objections, and Motion for Protective Order with respect to BellSouth Telecommunications, Inc.'s (hereinafter "BellSouth") Revised First Request for Production of Documents to AT&T Communications of the Southern States, Inc. dated December 15, 1995.

OBJECTIONS AND MOTION FOR PROTECTIVE ORDER

Pursuant to the terms of Order No. PSC-95-1084-PCO-TP issued by the Florida Public Service Commission ("Commission") in the above-referenced docket on August 30, 1995, AT&T served its Objections to BellSouth's Revised First Request for Production of Documents on December 26, 1995. A copy of such Objections is attached hereto and incorporated herein by specific reference thereto. AT&T's objections are submitted

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pursuant to the authority contained in Slatnick v. Leadership Housing Systems of Florida, Inc., 368 So.2d 79 (Fla. 3d DCA 1979). To the extent that a Motion for Protective Order is required, the objections attached hereto and incorporated herein by specific reference thereto are to be construed as a request for a protective order.

RESPONSES TO SPECIFIC REQUESTS

Subject to and without waiver of its General Objections, Specific Objections, or Motion for Protective Order, AT&T submits the following Responses to specific requests.

Request No. 1: Provide all documents identified or described in AT&T's responses to Interrogatory Nos. 1 through 9 of BellSouth's First Set of Interrogatories to AT&T.

Response: Consistent with AT&T's Objections served on BellSouth on December 26, 1995 and the execution of an appropriate protective agreement, AT&T will produce those documents, if any, set forth in its answers to BellSouth's First Set of Interrogatories to AT&T Communications of the Southern States, Inc. that are not otherwise in BellSouth's possession.

Request No. 2: Provide all documents referred to or relied upon by AT&T in responding to BellSouth's First Set of Interrogatories to AT&T.

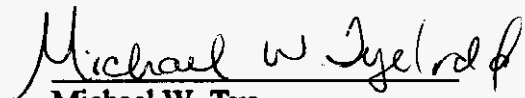
Response: Consistent with AT&T's Objections served on BellSouth on December 26, 1995 and the execution of an appropriate protective agreement, AT&T will produce those documents, if any, referred to or relied upon by AT&T in responding to BellSouth's First Set of Interrogatories to AT&T that are not otherwise in BellSouth's possession.

Request No. 3: Provide all documents that touch upon, describe or otherwise address the interconnection rates, terms or conditions that AT&T believes should apply to interconnection between local exchange companies and alternative local exchange companies.

Response:

Consistent with AT&T's Objections served on BellSouth on December 26, 1995 and the execution of an appropriate protective agreement, AT&T will produce those documents, if any, that touch upon, describe or otherwise address the interconnection rates, terms or conditions that AT&T believes should apply to interconnection between local exchange companies and alternative local exchange companies.

SUBMITTED this 4th day of January, 1996.



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**ATTORNEYS FOR AT&T
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CERTIFICATE OF SERVICE

DOCKET NO. 950984-TP

I hereby certify that copies of AT&T's Answers/Responses, Objections, and Motions for Protective Order have been served upon the following parties by Airborne Express, on this 4th day of January, 1996:

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