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February 26, 1996

Mrs. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 950984-TP
MFS v. United-Centel

Dear Mrs. Bayo:

Enclosed for filing in the above referenced docket are an original and fifteen (15) copies of AT&T's Objections to Sprint-United/Centel's First Set of Interrogatories and First Request for Production of Documents.

Copies of the foregoing are being served on all parties of record in accordance with the attached Certificate of Service.

Yours truly,

Michael W. Tye

Attachments

cc: J. P. Spooner, Jr.
Parties of Record

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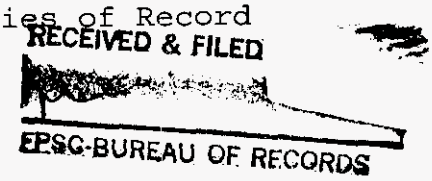

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of petition(s) to establish nondiscriminatory rates, terms, and conditions for resale involving local exchange companies and alternative local exchange companies pursuant to Section 364.161, Florida Statutes	**Docket No. 950984-TP** **Filed: February 26, 1996**

AT&T'S OBJECTIONS TO SPRINT UNITED/CENTEL'S FIRST SET OF INTERROGATORIES AND 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 1.340 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following Objections to Central Telephone Company of Florida and United Telephone Company of Florida's (hereinafter collectively referred to as "SPRINT UNITED/CENTEL") First Set of Interrogatories and First Request for Production of Documents to AT&T.

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-95-1083-PCO-TP issued by the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced docket on August 30, 1995. Should additional

grounds for objection be discovered as AT&T prepares its answers and responses to the above-referenced set of interrogatories and requests for production of documents, respectively, AT&T reserves the right to supplement, revise, or modify its objections at the time that it serves its answers and responses on SPRINT UNITED/CENTEL. Moreover, should AT&T determine that a Protective Order is necessary with respect to any of the material requested by SPRINT UNITED/CENTEL, AT&T reserves the right to file a motion with the Commission seeking such an order at the time that it serves its answers and responses on SPRINT UNITED/CENTEL.

General Objections

AT&T makes the following General Objections to SPRINT UNITED/CENTEL's First Set of Interrogatories and First Request for Production of Documents which will be incorporated by reference into AT&T's specific responses when its answers and responses are served on SPRINT UNITED/CENTEL.

1. AT&T objects to the definitions of "you", "your", "company" or "AT&T" contained in the "Definitions" section of SPRINT UNITED/CENTEL's First Request for Production of Documents to the extent that such definitions seek to impose an obligation on

AT&T Communications of the Southern States, Inc. to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such definition is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. Without waiver of its general objection, and subject to other general and specific objections, answers and responses to SPRINT UNITED/CENTEL'S First Set of Interrogatories and First Request for Production of Documents will be provided on behalf of AT&T Communications of the Southern States, Inc. which is the carrier certificated to provide regulated telecommunications services in Florida and which is a party to this docket. In addition to operating in the State of Florida, AT&T Communications of the Southern States, Inc. also operates in the States of Georgia, North Carolina and South Carolina. All references to "AT&T" in responding to SPRINT UNITED/CENTEL's discovery requests should be taken to mean AT&T Communications of the Southern States, Inc.

2. Unless otherwise indicated, AT&T has interpreted SPRINT UNITED/CENTEL's interrogatories and requests for production of documents to apply to AT&T's regulated intrastate operations in Florida and will limit its answers and responses accordingly. To

the extent that any discovery request is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission, AT&T objects to such request as irrelevant, overly broad, unduly burdensome, and oppressive.

3. AT&T objects to each and every discovery request and instruction to the extent that such request 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. AT&T objects to each and every discovery request 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 requests. Any answers or responses provided by AT&T to SPRINT UNITED/CENTEL's discovery requests will be provided subject to, and without waiver of, the foregoing objection.

5. AT&T objects to each and every discovery request 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. AT&T will attempt to note each instance where this objection applies.

6. AT&T objects to SPRINT UNITED/CENTEL's general instructions, definitions or specific discovery requests insofar as they seek to impose obligations on AT&T which exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

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

8. AT&T objects to each and every discovery request, general instruction, or definition insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. AT&T objects to each and every discovery request to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that SPRINT UNITED/CENTEL's discovery requests seek proprietary confidential business information which is not subject to the "trade secrets" privilege, AT&T will make such information available to counsel for SPRINT UNITED/CENTEL pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

10. AT&T objects to each of the interrogatories to the extent that they seek information that is not maintained in the format requested.

11. AT&T objects to the discovery requests to the extent that they seek information in the nature of market research. AT&T should not be required to provide to a competitor information which AT&T has compiled or which AT&T has paid to have complied and allow a competitor to have the benefit of such information.

12. AT&T has employees located in many different locations. In the course of its business, AT&T creates or comes into possession of countless documents that are not subject to any regulatory retention of records requirements. These documents are kept in numerous locations and are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document will be provided in response to these discovery requests. Rather, AT&T's responses will provide all of the information obtained by AT&T after a reasonable and diligent search conducted of those files that are reasonably expected to contain the requested information. To the extent that the discovery request purports to require more, AT&T

objects on the grounds that compliance would impose an undue burden or expense.

13. AT&T objects to every interrogatory that requests information about, or a summary of, a document which is also furnished pursuant to a document production request on the grounds that the documents speak for themselves and SPRINT UNITED/CENTEL is equally capable of extracting or summarizing the requested information.

Objections to Specific Interrogatories

Subject to, and without waiver of, the foregoing general objections, AT&T enters the following specific objections with respect to SPRINT UNITED/CENTEL's interrogatories:

INTERROGATORY NO. 2: Pursuant to General Objection No. 13, AT&T specifically objects to subparts (b) to (m) of this interrogatory on the grounds that such information is available to SPRINT UNITED/CENTEL from an examination of the documents covered by the related document production request.

INTERROGATORY NO. 3: To the extent that AT&T's answer to this interrogatory contains proprietary confidential business information, AT&T will allow counsel for SPRINT UNITED/CENTEL

to inspect such information only upon execution of an appropriate Protective Agreement.

INTERROGATORY NO. 4: Pursuant to General Objection No. 13, AT&T specifically objects to subparts (a) to (f) of this interrogatory on the grounds that such information is available to SPRINT UNITED/CENTEL from an examination of the documents covered by the related document production request. To the extent that AT&T's answer to this interrogatory contains proprietary confidential business information, AT&T will allow counsel for SPRINT UNITED/CENTEL to inspect such information only upon execution of an appropriate Protective Agreement.

INTERROGATORY NO. 7: AT&T objects to this interrogatory on the grounds that this request is irrelevant to the present proceeding inasmuch as it seeks to obtain information about nonlocal service provisioning. AT&T also objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and oppressive in that the request constitutes nothing more than an attempt by SPRINT UNITED/CENTEL to gain valuable competitive information designed to give SPRINT UNITED/CENTEL an unfair advantage in its attempts to enter the

interLATA telecommunications market when and if it seeks to do so. Furthermore, such information has no relevance to this case, nor does it relate to any potential issue in this case.

INTERROGATORY NO. 8: Same Objection as Interrogatory No. 7.

INTERROGATORY NO. 12: AT&T, as a certificated interexchange carrier and alternative local exchange service provider in Florida, is a direct competitor of SPRINT UNITED/CENTEL in Florida. AT&T objects to the disclosure of any information to SPRINT UNITED/CENTEL regarding the configuration of its actual or potential local exchange network and how AT&T plans to provide local service utilizing such network on the grounds that such information is highly sensitive, confidential business information which cannot be disclosed to a direct competitor and which constitutes a "trade secret" that is privileged under Florida law. AT&T objects to any request that would require it to release such information, even under a Protective Agreement, to a competitor, such as SPRINT UNITED/CENTEL. AT&T submits that this request is an improper attempt by SPRINT UNITED/CENTEL to secure valuable, competitively sensitive information intended to give it an advantage in any future negotiations that may take place

between AT&T and SPRINT UNITED/CENTEL. The forced disclosure of such information in this docket would improperly influence the bargaining positions of the parties, contrary to the intent of Section 364.161(1) of the Florida Statutes and Section 251(c)(1) of the Telecommunications Act of 1996.

Objections to Specific Document Production Requests

Subject to, and without waiver of, the foregoing general objections, AT&T enters the following specific objections with respect to SPRINT UNITED/CENTEL's document production requests:

REQUEST NO. 1: Pursuant to General Objection No. 1, AT&T will limit its answer to this interrogatory to matters that apply to the regulated intrastate operations of AT&T Communications of the Southern States, Inc., which operates in the states of Florida, Georgia, South Carolina, and North Carolina. AT&T also objects to this request on the grounds set forth in the individual specific objections made by AT&T to the related interrogatories. Such specific objections are incorporated herein by specific reference thereto.

REQUEST NO. 2: Pursuant to General Objection No. 1, AT&T will limit its answer to this interrogatory to matters that apply

to the regulated intrastate operations of AT&T Communications of the Southern States, Inc., which operates in the states of Florida, Georgia, South Carolina, and North Carolina. AT&T also objects to this request on the grounds that AT&T may be required to refer to or rely on a voluminous amount of information in order to respond to the related interrogatories and this request is therefore overly broad, unduly burdensome, and oppressive.

REQUEST NO. 3: AT&T objects to this request to the extent it calls for the disclosure of trade secrets or other highly confidential business information relating to AT&T's anticipated or required cost or revenue structure for competitive local exchange service. Moreover, the request is irrelevant inasmuch as AT&T is not a petitioner in this docket but is merely an intervenor. Indeed, the issues before the Commission relate to the specific requests of the petitioners and do not reference any request by AT&T. Furthermore, inasmuch as AT&T has not filed a petition with the Commission seeking unbundling and resale, AT&T also objects to this request as an improper attempt by SPRINT UNITED/CENTEL to secure valuable, competitively sensitive information intended

to give SPRINT UNITED/CENTEL an advantage in any future negotiations that might take place between AT&T and SPRINT UNITED/CENTEL. AT&T submits that the forced disclosure of such information in this docket would improperly influence the bargaining positions of the respective parties, contrary to the intent of Section 364.161(1) of the Florida Statutes and Section 251(c)(1) of the Telecommunications Act of 1996.

REQUEST NO. 4: Same Objection as Request No. 3.

REQUEST NO. 5: Same Objection as Request No. 3.

REQUEST NO. 6: Same Objection as Request No. 3. In addition, AT&T objects to this request to the extent it seeks to obtain documents that are protected by the attorney/client privilege or the work product privilege.

SUBMITTED this 26th day of February, 1996.

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ATTORNEYS FOR AT&T
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STATES, INC.

CERTIFICATE OF SERVICE

DOCKET NO. 950984-TP

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand-delivery to the following parties of record this 26th day of February, 1996:

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