

NANCY B. WHITE
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150 South Monroe Street
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September 9, 1996

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

RE: Docket No. 96-0000-TP

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response and Objections to AT&T's First Request for Production of Documents. Please file these documents in the above-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
(BW)

Nancy B. White

ACK _____ Enclosures

ASA _____

cc: All Parties of Record

APP _____

A. M. Lombardo

CAS _____

R. G. Beatty

CRS _____

W. J. Ellenberg

CSA _____

CSB _____

CSJ _____

CSK _____

CSL _____

CSM _____

CSP _____

CSQ _____

CSR _____

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CSV _____

CSW _____

CSX _____

CSY _____

CSZ _____

DOCUMENT NUMBER-DATE

09563 SEP-96

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
DOCKET NO. 960833-TP
DOCKET NO. 960846-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express this 9th day of September, 1996 to the following:

Tracy Hatch
AT&T Communications of the
Southern States, Inc.
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
(904)425-6364
(904)425-6343 (fax)

Donna Canzano
Florida Public Service
Commission
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Nancy B. White (for)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Matter of the)
Interconnection Agreement) Docket No. 960833-TP
Negotiations Between AT&T)
Communications of the Southern) Filed: September 9, 1996
States, Inc. and BellSouth)
Telecommunications, Inc.)
Pursuant to 47 U.S.C. § 252)
_____)

BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSE AND
OBJECTIONS TO AT&T'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

COMES NOW BellSouth Telecommunications, Inc., ("BellSouth" or "Company"), and hereby files, pursuant to Rule 25-22.034 and 25-22.035, Florida Administrative Code, and Rules 1.340 and 1.280(b), Florida Rules of Civil Procedure, the following Response and Objections to AT&T Communications of the Southern States, Inc.'s ("AT&T") First Request for Production of Documents dated August 20, 1996.

GENERAL OBJECTIONS

1. BellSouth incorporates into this response by reference the General Objections filed by BellSouth to AT&T's First Request for Production of Documents on August 30, 1996.

2. BellSouth objects to each and every request to produce to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that AT&T requests proprietary confidential business information which is not subject to the "trade secrets" privilege, BellSouth will make such information available to counsel for AT&T pursuant to an appropriate

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Protective Agreement, subject to any other general or specific objections contained herein.

3. BellSouth is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, BellSouth creates countless documents that are not subject to Florida Public Service Commission or FCC retention of records requirements. These documents are kept in numerous locations that 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 has been provided in response to these discovery requests. Rather, these responses provide all of the information obtained by BellSouth after a reasonable and diligent search conducted in connection with this discovery request. BellSouth has complied with AT&T's request that a search be conducted of those files that are reasonably expected to contain the requested information. To the extent that the discovery request purports to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

4. To the extent BellSouth agrees to produce documents responsive to AT&T's requests, BellSouth will make those documents available for review and copying at BellSouth's offices located at 675 W. Peachtree Street, Atlanta, Georgia, unless the parties agree otherwise.

SPECIFIC RESPONSES

Subject to, and without waiver of, the foregoing general objections, BellSouth enters the following specific responses to AT&T's requests:

Request Nos. 1-3

BellSouth will produce documents, if any, that are responsive to these requests.

Request No. 4

For the reasons stated in its objections to Request No. 4, BellSouth will not produce documents, if any, that are responsive to this request.

Request No. 5

BellSouth will produce documents that are responsive to this request.

Request No. 6

Subject to and in accordance with the objections lodged by BellSouth regarding Request No. 6, BellSouth will produce certain documents that are responsive to this request. Specifically, BellSouth will produce current, Florida-specific cost studies.

Request No. 7

For the reasons stated in its objections to Request No. 7, BellSouth will not produce documents, if any, that are responsive to this request.

Request No. 8

Subject to and in accordance with the objections lodged by BellSouth regarding Request No. 8, BellSouth will produce certain

documents that are responsive to this request. Specifically, BellSouth will produce current, Florida-specific cost studies.

Request No. 9

See responses to Nos. 5, 6, 7 and 8. Any production of documents responsive to Request No. 9 will be made consistent with BellSouth's responses to Nos. 5, 6, 7, and 8.

Request Nos. 10-11

Subject to and in accordance with the objections lodged by BellSouth regarding Request Nos. 10 and 11, BellSouth will produce certain documents that are responsive to this request. Specifically, BellSouth will produce Florida-specific agreements and cost-based access proposals, if any.

Request No. 12

Subject to and in accordance with the objections lodged by BellSouth regarding Request No. 12, BellSouth will produce documents that are responsive to this request. Specifically, BellSouth will produce documents bearing only on BellSouth's regulated intrastate operations in Florida.

Request Nos. 13-14

Subject to and in accordance with the objections lodged by BellSouth regarding Request Nos. 13 and 14, BellSouth will produce certain documents that are responsive to this request. Specifically, BellSouth will produce documents that bear only on BellSouth's regulated intrastate operations in Florida.

Request No. 15

Subject to and in accordance with the objections lodged by BellSouth regarding Request No. 15, BellSouth will produce certain documents that are responsive to this request. Specifically, BellSouth will produce current, Florida-specific cost studies.

Request Nos. 16-17

Subject to and in accordance with the objections lodged by BellSouth regarding Request Nos. 16 and 17, BellSouth will produce certain documents that are responsive to this request. Specifically, BellSouth will produce current, Florida-specific cost studies.

Request Nos. 18-20

BellSouth will produce documents, if any, that are responsive to this request.

Request No. 21

As stated in its objection lodged by BellSouth regarding Request No. 21, BellSouth cannot and will not produce documents responsive to this request because the responsive documents are not within its custody.

Request Nos. 22-23

BellSouth will produce documents, if any, that are responsive to this request.

Request No. 24

Subject to and in accordance with the objections lodged by BellSouth regarding Request No. 24, BellSouth will produce

certain documents that are responsive to this request. Specifically, BellSouth will produce documents that bear only on BellSouth's regulated intrastate operations in Florida.

Request Nos. 25-39

BellSouth will produce documents, if any, that are responsive to this request.

Request No. 40

For the reasons stated in its objections to Request No. 40, BellSouth will not produce documents, if any, that are responsive to this request.

Request No. 41

BellSouth will produce documents, if any, that are responsive to this request.

Request No. 42

For the reasons stated in its objections to Request No. 42, BellSouth will not produce documents, if any, that are responsive to this request.

Request No. 43

For the reasons stated in its objections to Request No. 43, BellSouth will not produce documents, if any, that are responsive to this request.

Request No. 44

Subject to and in accordance with the objections lodged by BellSouth regarding Request No. 44, BellSouth will produce certain documents that are responsive to this request. Specifically, BellSouth will produce documents that bear only on BellSouth's regulated intrastate operations in Florida.

Request No. 45

BellSouth will produce documents, if any, that are responsive to this request.

Request No. 46

Subject to and in accordance with the objections lodged by BellSouth regarding Request No. 46, BellSouth will produce certain documents that are responsive to this request. Specifically, BellSouth will produce current, Florida-specific cost studies.

Request No. 47

For the reasons stated in its objections to Request No. 47, BellSouth will not produce documents, if any, that are responsive to this request.

Request No. 48-49

Subject to and in accordance with the objections lodged by BellSouth regarding Request Nos. 48 and 49, BellSouth will produce certain documents that are responsive to this request. Specifically, BellSouth will produce certain Florida-specific cost studies.

Request No. 50

Subject to and in accordance with the objections lodged by BellSouth regarding Request No. 50, BellSouth will produce documents that are responsive to this request. Specifically, BellSouth will produce documents that bear specifically on BellSouth's regulated intrastate operations in Florida.

Request No. 51

For the reasons stated in its objections to Request No. 51, BellSouth will not produce documents, if any, that are responsive to this request.

Request No. 52-56

BellSouth will produce documents, if any, that are responsive to this request.

Respectfully submitted this 9th day of September, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert M. Beatty (ps)

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