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October 7, 1996

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

Docket No. 960847-TP and 960880-TP

Dear Mrs. Bayo:

Enclosed for filing in the above referenced docket are an original and fifteen (15) copies of AT&T's Responses, Objections, and Motion for Protective Order with Respect to GTE Florida, Incorporated's First Set of Interrogatories.

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

Yours truly,

Tracy Hatch
Tracy Hatch

Attachments

cc: Parties of Record

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



DOCUMENT NUMBER-DATE
10704 OCT-7 96
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by AT&T Communications of)	
the Southern States, Inc., MCI)	
Telecommunications Corporation and MCI)	Docket No. 960847-TP
Metro Access Transmission Services, Inc., for)	Docket No. 960980-TP
arbitration of certain terms and conditions)	
of a proposed agreement with GTE Florida,)	
Incorporated concerning interconnection and)	Filed: October 7, 1996
resale under the Telecommunications Act of 1996))	

**AT&T'S ANSWERS, OBJECTIONS, AND MOTION FOR PROTECTIVE
ORDER WITH RESPECT TO GTE FLORIDA, INCORPORATED'S
FIRST SET OF INTERROGATORIES**

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 Answers, Objections, and Motion for Protective Order with respect to GTE Florida Incorporated's (hereinafter "GTE") First Set of Interrogatories to AT&T Communications of the Southern States, Inc., dated September 17, 1996.

OBJECTIONS AND MOTION FOR PROTECTIVE ORDER

Pursuant to the terms of Order No. PSC-96-1053-PCO-TP issued by the Florida Public Service Commission ("Commission") in the above-referenced docket on August 16, 1996, AT&T served its Objections to GTE's First Set of Interrogatories on September 27, 1996. A copy of such Objections is attached hereto and incorporated herein by specific reference thereto. AT&T's objections are submitted 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

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objections attached hereto and incorporated herein by specific reference thereto are to be construed as a request for a protective order.

ANSWERS TO SPECIFIC INTERROGATORIES

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

INTERROGATORY NO. 1:

Please describe AT&T's current marketing plans for local exchange service.

RESPONSE:

AT&T objects to this interrogatory on the grounds that it is irrelevant, overly broad, unduly burdensome and not calculated to lead to the discovery of admissible evidence. AT&T further objects to this request on the ground that it seeks highly confidential trade secret information that is of no relevance to this proceeding.

INTERROGATORY NO. 2:

Please describe in detail AT&T's plans for interconnection with GTE's network and how such plans would be considered technically feasible.

RESPONSE:

AT&T desires the option to interconnect with GTE at any technically feasible point on its network, including at GTE end office and tandem switches. Both of these forms of interconnection were expressly provided for in the FCC's First Report and Order and Further Notice of Proposed Rulemaking, Dated August 8, 1996 ("FCC Order"). AT&T believes that the interconnection it has requested and detailed in the testimony of Mr. Crafton is technically feasible. If GTE believes that certain interconnection requests are not technically feasible, GTE must come forward with an appropriate showing of such technical unfeasibility.

Provided by: John Hamman-- Technical Support Manager
AT&T
1200 Peachtree Street, N.E.
Atlanta, Georgia 30309

INTERROGATORY NO. 3:

Has AT&T entered into arrangements with any ILECs for interconnection that would require modifications to the ILEC's network to facilitate interconnection? To the extent AT&T has entered into such arrangements, please describe in detail arrangements made for the recovery of the ILEC's costs of such modifications.

RESPONSE:

Subject to and without waiver of the Objections AT&T served on GTE on September 27, 1996, AT&T provides the following Response to the above interrogatory.

AT&T has not entered into any agreements under Sections 251 and 252 of the Telecommunications Act with ILECs in Florida at this time.

Provided by: John Hamman-- Technical Support Manager
AT&T
1200 Peachtree Street, N.E.
Atlanta, Georgia 30309

INTERROGATORY NO. 4:

In addition to any arrangements identified in response to item 3, above, has AT&T engaged in any discussions with ILECs regarding modification to the ILECs network to facilitate interconnection and cost recovery? If so, please describe such discussions in detail.

RESPONSE:

In accordance with AT&T's Objections, AT&T objects to this interrogatory on the grounds that its negotiations and discussions with other carriers are irrelevant to this proceeding and are not, therefore, reasonably calculated to lead to the discovery of admissible evidence. AT&T also objects to this interrogatory to the extent it seeks to discover information which may be proprietary and confidential to other ILECs and which may be the subject of a protective agreement between the parties

involved in negotiations. AT&T also objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and oppressive.

INTERROGATORY NO. 5:

Does AT&T currently receive inter-tandem switching service through interconnection on an ILEC's tandem in a multi-tandem LATA? If the answer is yes, please state the traffic type which AT&T is able to terminate (i.e., local, toll access, etc.).

RESPONSE:

AT&T does not currently receive inter-tandem switching service through interconnection on an ILEC's tandem in a multi-tandem LATA in Florida.

Provided by: Doug Ripley-- District Manager LIAM
AT&T
1200 Peachtree Street, N.E.
Atlanta, Georgia 30309

INTERROGATORY NO. 6:

If the answer to 5, above, is yes, has AT&T entered into any arrangements to provide for billing of traffic terminated through inter-tandem switching?

RESPONSE:

N/A

Provided by: Doug Ripley-- District Manager LIAM
AT&T
1200 Peachtree Street, N.E.
Atlanta, Georgia 30309

INTERROGATORY NO. 7:

In addition to the arrangements identified in response to 5 or 6, above, has AT&T engaged in any discussions with ILECs regarding inter-tandem switching or the billing

arrangement for such switching? If the answer is yes, please describe such discussions in detail.

RESPONSE:

No.

Provided by: Doug Ripley-- District Manager LIAM
AT&T
1200 Peachtree Street, N.E.
Atlanta, Georgia 30309

INTERROGATORY NO. 8:

Please specifically identify the amount by which AT&T's identified costs for intrastate interLATA long distance transport and intrastate intraLATA long distance transport, respectively, exceed the total service long run incremental cost (TSLRIC) or total element long run incremental cost (TELRIC) of such transport, as reflected in any cost studies prepared by or for AT&T.

RESPONSE:

In accordance with AT&T's Objections, AT&T objects to this interrogatory on the grounds that it is irrelevant, overly broad, unduly burdensome, and not calculated to lead to the discovery of admissible evidence. AT&T further objects to this interrogatory on the grounds that it seeks highly confidential trade secret information that is of no relevance to this proceeding. To the extent GTE's interrogatory seeks information pertaining to AT&T's obligations and practices as an interexchange carrier in the highly competitive interexchange market, such information is irrelevant to GTE's duties and obligations under the federal act, the FCC's Order, and Florida law as a monopolist, incumbent local exchange carrier in the local exchange market.

INTERROGATORY NO. 9:

Does AT&T have any arrangements with ILECs for mutual recovery of costs for transport and termination? If so, please describe any such arrangements.

RESPONSE:

Subject to and without waiver of the Objections AT&T served on GTE on September 27, 1996, AT&T provides the following Response to the above interrogatory.

AT&T has not entered into any agreements under Sections 251 and 252 of the Telecommunications Act with ILECs in Florida at this time.

Provided by: Karen Cummings-- Manager
AT&T
1200 Peachtree Street, N.E.
Atlanta, Georgia 30309

INTERROGATORY NO. 10:

If AT&T currently receives inter-tandem switching service through interconnection on an ILEC's tandem in a multi-tandem LATA, please provide copies of any agreements, internal company memorandum materials and other associated documents respecting such arrangements.

RESPONSE:

See Response to Interrogatory No. 5.

INTERROGATORY NO. 11:

Does AT&T have any arrangements with ILECs for meet point compensation of switched access revenues? If so, please describe such arrangements.

RESPONSE:

Yes. Such arrangements are detailed in the publicly filed tariffs of local exchange companies in Florida.

Provided by: Debbie Joyce
AT&T
1200 Peachtree Street, N.E.
Atlanta, Georgia 30309

INTERROGATORY NO. 12:

Has AT&T engaged in any discussions with ILECs regarding meet point compensation of switched access service revenue? If the answer is yes, please describe such discussions in detail.

RESPONSE:

See Response to Interrogatory No. 4.

INTERROGATORY NO. 13:

Does AT&T anticipate becoming a facilities-based provider of the following services?

- a. Class 5 central offices for handling local switching, line side/trunk side connections and interexchange access transport on behalf of other carriers.
- b. Class 4 tandem office for handling toll switching, interexchange access switching, wireless access switching and trunk side connections.
- c. Distribution facilities from the end user's network to the AT&T central office or any part of any subpart of the local loop.
- d. Database and signaling systems.

RESPONSE:

AT&T has been certificated in Florida to provide both facilities-based and resale local exchange service. AT&T currently anticipates that it will become a facilities based provider of the above referenced services.

Provided by: Doug Ripley-- District Manager LIAM
 AT&T
 1200 Peachtree Street, N.E.
 Atlanta, Georgia 30309

INTERROGATORY NO. 14:

For all responses to 12(a), (b), (c), and (d), above, please state (1) when such construction is projected to begin and (2) in what geographic areas such construction is planned to take place.

RESPONSE:

See Response to Interrogatory No. 8.

INTERROGATORY NO. 15:

Please describe in detail AT&T's plans for unbundling of the following network elements, and how such plans would be considered technically feasible:

- a. Network Interface Device;
- b. Loops, including, but not limited to, residential, business and coin operated pay telephone (COPT) loops;
- c. Ports;
- d. Local Switching;
- e. Tandem Switching;
- f. Asynchronous Transfer Mode (ATM);
- g. Packet Switching;
- h. Database, including but not limited to, LIDB, Toll Free 800, SCP, AIN and Directory Assistance);
- i. SS7;
- j. AIN Services and functions;
- k. Operator Services;
- l. Directory Assistance;
- m. 911 or E911 Service;
- n. Operations Support Systems;
- o. BLV/BLVI Service; and
- p. Directory Listings.

RESPONSE:

Based on my understanding, Section 251(c)(3) of the Telecommunications Act requires ILECs to provide, to any requesting telecommunications carrier for the provision of a telecommunication service, nondiscriminatory access to network elements on an unbundled basis at any technically feasible points. AT&T is not an incumbent local exchange carrier, and therefore, has no obligations to unbundle such elements.

Provided by: John Hamman-- Technical Support Manager
 AT&T
 1200 Peachtree Street, N.E.
 Atlanta, Georgia 30309

INTERROGATORY NO. 16:

Has AT&T entered into arrangements with any ILECs for unbundling of network elements that would require modifications to the ILEC's network to facilitate unbundling? To the extent AT&T has entered into such arrangements, please describe in detail arrangements made for the recovery of the ILECs costs of such modifications.

RESPONSE:

Subject to and without waiver of the Objections AT&T served on GTE on September 27, 1996, AT&T provides the following Response to the above interrogatory.

AT&T has not entered into any agreements under Sections 251 and 252 of the Telecommunications Act with ILECs in Florida at this time.

Provided by: John Hamman-- Technical Support Manager
 AT&T
 1200 Peachtree Street, N.E.
 Atlanta, Georgia 30309

INTERROGATORY NO. 17:

In addition to any arrangements identified in response to item 16, above, has AT&T engaged in any discussions with ILECs regarding modification to the ILECs network to facilitate unbundling and cost recovery? If so, please such discussions in detail.

RESPONSE:

See response to Interrogatory No. 4.

INTERROGATORY NO. 18:

Please describe in detail those services AT&T wishes to purchase for GTE for resale.

RESPONSE:

GTE is required to make all of its services available for resale pursuant to the Telecommunications Act of 1996. The testimony of AT&T witness Sather, the AT&T Petition and the proposed Interconnection Agreement submitted in this proceeding describes in detail those services AT&T wishes to purchase from GTE.

Provided by: L.G. Sather-- District Manager
AT&T
1200 Peachtree Street, N.E.
Atlanta, Georgia 30309

INTERROGATORY NO. 19:

To the extent any of the services identified in response to item 18, above, include operator services or directory assistance services, please describe the reason AT&T has not opted to purchase operator service or directory assistance services on an unbundled basis.

RESPONSE:

AT&T is still in the process of evaluating its options under the Act. However, the FCC Order and the Act requires GTE to unbundle these services and to provide them at resale.

Provided by: John Hamman-- Technical Support Manager
AT&T
1200 Peachtree Street, N.E.
Atlanta, Georgia 30309

INTERROGATORY NO. 20:

Please explain when AT&T plans to initiate the following services and in what geographic areas:

- a. resale of local residential service;
- b. resale of local business service.

RESPONSE:

Subject to, and without waiver of, the Objections AT&T served on GTE on September 27, 1996, AT&T objects to this request on the grounds that it seeks highly confidential business information which constitutes a "trade secret" under Florida law. AT&T further objects to this interrogatory on the grounds that it is irrelevant and not likely to lead to the admissibility of relevant information.

INTERROGATORY NO. 21:

Does AT&T intend to combine the resale of local service (residential or business) with the sale of any of the following services?:

- a. long distance intraLATA service;
- b. long distance interLATA service;
- c. cellular service;
- d. paging service;
- e. Internet access service; or
- f. video or cable television service.

RESPONSE:

See response to Interrogatory No. 20.

INTERROGATORY NO. 22:

As to all affirmative responses to the questions in item 21, above, please state a) when such combined service is anticipated to be offered and b) in what geographic area.

RESPONSE:

See response to Interrogatory No. 20.

INTERROGATORY NO. 23:

As to all affirmative responses to the question in item 21, above, please state whether a) such combined service will be offered at a "packaged" price; that is, one price for local service plus the additional service(s) or b) each service will be offered individually at its own price.

RESPONSE:

See response to Interrogatory No. 20.

INTERROGATORY NO. 24:

Does AT&T currently offer any telecommunications services for resale?

RESPONSE:

Consistent with and without waiver of the Objections AT&T served on GTE on September 27, 1996, AT&T objects to this interrogatory on the grounds that it is irrelevant, and not calculated to lead to the discovery of admissible evidence. AT&T's obligations and practices as an interexchange carrier in the highly competitive interexchange market is irrelevant to GTE's duties and obligations

under the Telecommunications Act of 1996, the FCC's Order, and Chapter 364 of the Florida law.

INTERROGATORY NO. 25:

If the answer to item 24 is yes, please explain how such services are priced.

RESPONSE:

See response to Interrogatory No. 24.

INTERROGATORY NO. 26:

Please describe the circumstances under which AT&T would discount the price for telecommunications services identified in response to item 26 (a) or (b) above, please explain how such discount is applied.

RESPONSE:

See response to Interrogatory No. 24.

INTERROGATORY NO. 27:

If there are circumstances under which AT&T would discount the price for telecommunications services identified in response to item 26 (a) or (b) above, please explain how such discount is applied.

RESPONSE:

See response to Interrogatory No. 24.

INTERROGATORY NO. 28:

Please describe in detail AT&T's plans for physical or virtual collocation of equipment on GTE's premises, including identification of those premises at which AT&T wishes to collocate.

RESPONSE:

During the first part of August, AT&T provided GTE with its application for collocation and with Access Service Requests (ASRs) which detailed AT&T's plans for collocation including the identification of those premises at which AT&T wishes to collocate and the

equipment AT&T wishes to collocate. Receipt of those requests were acknowledged on August 29, 1996 by Ms. Joan Sykes of GTE. Therefore, AT&T has supplied this information previously to GTE and GTE should have this information in its possession.

Provided by: Sandra Fuller
AT&T
1200 Peachtree Street, N.E.
Atlanta, Georgia 30309

INTERROGATORY NO. 29:

Please describe in detail the equipment AT&T wishes to physically or virtually collocate on GTE's premises and how the placement of such equipment is necessary to interconnection or access to unbundled network elements.

RESPONSE:

See response to Interrogatory No. 28.

INTERROGATORY NO. 30:

Does AT&T have physical or virtual collocation arrangements with any ILECs?

RESPONSE:

Yes.

Provided by: Sandra Fuller
AT&T
1200 Peachtree Street, N.E.
Atlanta, Georgia 30309

INTERROGATORY NO. 31:

Please identify the ILECs and wire centers where AT&T has agreed with the ILEC that AT&T shall cross-connect with other carriers at the same wire center.

RESPONSE:

See Response to Interrogatory No. 3.

Provided by: Sandra Fuller
AT&T
1200 Peachtree Street, N.E.
Atlanta, Georgia 30309

INTERROGATORY NO. 32:

In addition to any arrangements identified in response to item 30, above, has AT&T engaged in any discussions with ILECs regarding physical or virtual collocation? If so, please describe such discussions in detail.

RESPONSE:

See Response to Interrogatory No. 4.

INTERROGATORY NO. 33:

Does AT&T have any interim or permanent number portability arrangements with ILECs? If the answer is yes, please describe such arrangements.

RESPONSE:

Subject to and without waiver of the Objections AT&T served on GTE on September 27, 1996, AT&T provides the following Response to the above interrogatory.

The Florida Public Service Commission has approved certain interim number portability solutions in Docket No. 950737-TP and is investigating permanent solutions in Docket No. 960100-TP. However, AT&T has not entered into any interim or permanent number portability arrangements with ILECs in Florida under the Act.

Provided by: John Hamman-- Technical Support Manager
AT&T
1200 Peachtree Street, N.E.
Atlanta, Georgia 30309

INTERROGATORY NO. 34:

In addition to any arrangement identified in response to item 33, above, has AT&T engaged in any discussions with ILECs regarding interim number portability, permanent

number portability, or compensations for either? If the answer is yes, please describe such discussions in detail.

RESPONSE:

See Response to Interrogatory No. 4.

INTERROGATORY NO. 35:

Does AT&T have any arrangements with ILECs for the sharing of access revenue as it relates to interim number portability? If the answer is yes, please describe any such arrangements.

RESPONSE:

Subject to and without waiver of the Objections AT&T served on GTE on September 27, 1996, AT&T provides the following Response to the above interrogatory.

AT&T has not entered into any agreements under Sections 251 and 252 of the Telecommunications Act with ILECs in Florida at this time.

Provided by: John Hamman-- Technical Support Manager
 AT&T
 1200 Peachtree Street, N.E.
 Atlanta, Georgia 30309

INTERROGATORY NO. 36:

Please describe in detail AT&T's plan for interconnections with GTE's network and how such plans would be considered technically feasible.

RESPONSE:

The testimony and exhibits of AT&T witness Crafton and the AT&T proposed Interconnection Agreement submitted in this proceeding provides the information requested in this interrogatory.

Provided by: John Hamman-- Technical Support Manager
 AT&T
 1200 Peachtree Street, N.E.
 Atlanta, Georgia 30309

INTERROGATORY NO. 37:

Please identify all arrangements between AT&T and any ILECs for the following:

- a. Access to Operations Support Systems (OSS);
- b. Compensation for such access;
- c. Implementation of electronic interfaces for such access;
- d. Primary Interexchange Carrier (PIC) changes;
- e. Quality standards for OSS;
- f. Branding for repair calls and service technicians;
- g. Billing for third-party information service calls; and
- h. Access to customer account information.

RESPONSE:

Subject to and without waiver of the Objections AT&T served on GTE on September 27, 1996, AT&T provides the following Response to the above interrogatory.

AT&T has not entered into any agreements under Sections 251 and 252 of the Telecommunications Act with ILECs in Florida at this time.

Provided by: Ronald H. Shurter
 AT&T
 1200 Peachtree Street, N.E.
 Atlanta, Georgia 30309

INTERROGATORY NO. 38:

In addition to any arrangements identified in response to item 37, above, has AT&T engaged in any discussions with ILECs regarding the issues listed at item 37? If so, please describe such discussions in detail.

RESPONSE:

See Response to Interrogatory No. 4.

INTERROGATORY NO. 39:

Please identify all electronic interface systems currently used or intended to be used by AT&T for access to operations support systems of other telecommunications carriers.

RESPONSE:

AT&T's proposed Interconnection Agreement filed with its Petition for Arbitration and the testimony of AT&T witness Shurter address the information sought in this interrogatory in detail.

Provided by: Ronald H. Shurter
 AT&T
 1200 Peachtree Street, N.E.
 Atlanta, Georgia 30309

INTERROGATORY NO. 40:

Has AT&T engaged in any discussions with ILECs regarding remedies for failure to meet performance standards? If so, please describe such discussions in detail.

RESPONSE:

See Response to Interrogatory No. 4.

INTERROGATORY NO. 41:

Please identify all arrangements between AT&T and any ILEC for access to poles, ducts, conduits and rights of way.

RESPONSE:

Subject to and without waiver of the Objections AT&T served on GTE on September 27, 1996, AT&T provides the following Response to the above interrogatory.

AT&T has not entered into any agreements under Sections 251 and 252 of the Telecommunications Act with ILECs in Florida at this time.

Provided by: Ronald H. Shurter
 AT&T
 1200 Peachtree Street, N.E.
 Atlanta, Georgia 30309

With respect to the arrangements identified in response to item 41, above, has AT&T engaged in any discussions with ILECs regarding access to poles, ducts, conduits, and rights of way? If so, please describe such discussions in detail.

RESPONSE:

See Response to Interrogatory No. 4.

INTERROGATORY NO. 43:

In addition to any arrangements identified in response to item 41, above, has AT&T engaged in any discussions with ILECs regarding access to poles, ducts, conduits, and rights of way? If so, please describe such discussions in detail.

RESPONSE:

See Response to Interrogatory No. 4.

INTERROGATORY NO. 44:

Please describe in detail AT&T's definition of the following terms:

- a. Total Element Long Run Incremental Cost (TELRIC), including all applicable cost principles, inputs, and assumptions;
- b. Total Service Long Run Incremental Cost (TSLRIC), including all applicable cost principles, inputs, and assumptions;
- c. Joint Costs;
- d. Common Costs;
- e. Avoided Costs.

RESPONSE:

AT&T defines and describes the above requested terms in detail in the testimony and exhibits of AT&T witnesses Mike Guedel, Don Wood, Art Lerma and David Kasserman.

Provided by: Mike Guedel
AT&T
1200 Peachtree Street, N.E.
Atlanta, Georgia 30309

INTERROGATORY NO. 45:

Please identify all services and network elements AT&T currently offers for sale, including but not limited to :

- a. intrastate interLATA telephone service;
- b. intrastate intraLATA telephone service;
- c. WATS inbound or outbound services;
- d. transmission facilities used for interLATA telephone service;
- e. switching facilities used for interLATA telephone service; and
- f. any other services offered at retail or wholesale.

RESPONSE:

See response to Interrogatory No. 8.

INTERROGATORY NO. 46:

Please describe in detail how AT&T prices the services identified in response to item 45, above, and specify whether AT&T's price is determined according to AT&T's TSLRIC or TELRIC for the service plus a reasonable allocation of joint and common costs plus a reasonable profit.

RESPONSE:

See response to Interrogatory No. 8.

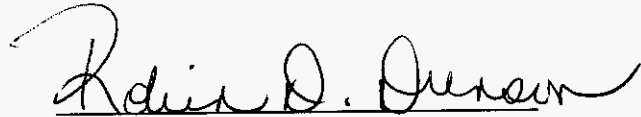
INTERROGATORY NO. 47:

For each service or network element identified in response to item 45, above, please identify the most recent price AT&T charges for providing or reselling such features, function or services.

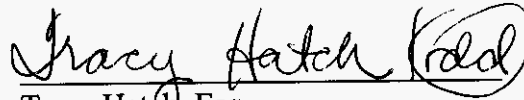
RESPONSE:

See response to Interrogatory No. 8.

Respectfully submitted this 7th day of October, 1996.



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ATTORNEYS FOR AT&T
COMMUNICATIONS OF THE
SOUTHERN STATES, INC.

AFFIDAVIT

**STATE OF GEORGIA
COUNTY OF FULTON**

BEFORE ME, the undersigned authority, personally appeared JOHN M. HAMMAN, who deposed and stated that he/she provided the answers to Interrogatories Nos. 2, 3, 15, 14, 19, 33, 35, 36 of GTE Florida Incorporated's First Set of Interrogatories to AT&T Communications of the Southern States, Inc., served on AT&T in Docket No. 960847-TP, and that the responses are true and correct to the best of his/her information and belief.

DATED AT Atlanta, Georgia, this 4th day of October, 1996.

John M. Hamman
Signature of Affiant

SWORN TO AND SUBSCRIBED before me this 4th day of October, 1996.

NOTARY PUBLIC

State of Georgia

My Commission Expires: Sara K. Burrow, Notary Public
My Commission Expires September 9, 1999

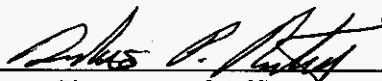
Sara K. Burrow
Signature of Notary Public

AFFIDAVIT

**STATE OF GEORGIA
COUNTY OF FULTON**

BEFORE ME, the undersigned authority, personally appeared
DOUGLAS P. RIPLEY, who deposed and stated that
he/she provided the answers to Interrogatories Nos. 5, 6, 7, 13
of GTE Florida Incorporated's First Set of Interrogatories to AT&T Communications of
the Southern States, Inc., served on AT&T in Docket No. 960847-TP, and that the
responses are true and correct to the best of his/her information and belief.

DATED AT Atlanta, Georgia, this 4th day of October, 1996.



Signature of Affiant

SWORN TO AND SUBSCRIBED before me this 4th day of October,
1996.

NOTARY PUBLIC

State of Georgia

My Commission Expires: Sara K. Burrow, Notary Public
~~My Commission Expires September 9, 1999~~




Signature of Notary Public

AFFIDAVIT

**STATE OF GEORGIA
COUNTY OF FULTON**

BEFORE ME, the undersigned authority, personally appeared Karen Cummings, who deposed and stated that he/she provided the answers to Interrogatories Nos. 9 & 44 of GTE Florida Incorporated's First Set of Interrogatories to AT&T Communications of the Southern States, Inc., served on AT&T in Docket No. 960847-TP, and that the responses are true and correct to the best of his/her information and belief.

DATED AT Atlanta, Georgia, this 4 day of October, 1996.



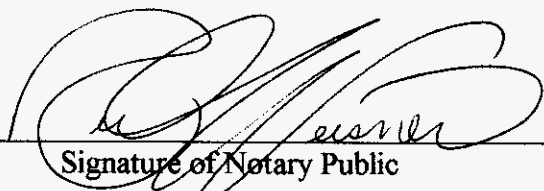
Signature of Affiant

SWORN TO AND SUBSCRIBED before me this 4th day of October, 1996.

NOTARY PUBLIC

State of Georgia

My Commission Expires: Notary Public, Gwinnett County, Georgia
My Commission Expires October 12, 1999



Signature of Notary Public

CERTIFICATE OF SERVICE

DOCKET NOS. 960847-TP and 960980-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 7th day of October, 1996:

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