

Tracy Hatch
Attorney

Suite 700
101 N. Monroe St.
Tallahassee, FL 32301
904 425-6364
FAX: 904 425-6361

July 10, 1997

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

Docket No. 970172-TP, 970173-TP & 970281-TL

Dear Mrs. Bayo:

Enclosed for filing in the above referenced docket
are an original and fifteen (15) copies of AT&T's
Objections to BellSouth Telecommunications, Inc.'s First
Request for Production of Documents.

Yours truly,
Tracy Hatch
Tracy Hatch

- ACK
- AFA 3
- APP
- CAF
- CMU
- CTR
- EAG
- LEG 2
- LIN 5
- OPC
- RCH
- SEC 1
- WC

cc: Parties of Record

one each Docket

DOCUMENT DATE
06939 JUL 10 97

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL
FILE COPY

In re: Petition by MCI)
Telecommunications Corporation)
for an order requiring BellSouth)
Telecommunications, Inc. to remove)
its deregulated payphone investment)
and associated expenses from its)
intrastate operations and reduce)
the Carrier Common Line rate)
element of its intrastate switched)
access charges by approximately)
\$36.5 million as required by the)
Federal Telecommunications Act)
of 1996.)

Docket No. 970172-TP

Filed: June 10, 1997

In re: Petition by MCI)
Telecommunications Corporation)
for an order requiring GTE Florida)
Incorporated to remove its)
deregulated payphone investment)
and associated expenses from its)
intrastate operations and reduce)
the Carrier Common Line rate)
element of its intrastate switched)
access charges by approximately)
\$9.6 million as required by the)
Federal Telecommunications Act)
of 1996.)

Docket No. 970173-TP

In re: Establishment of)
intrastate implementation)
requirement governing)
federally mandated)
deregulation of local)
exchange company payphones.)

Docket No. 970281-TL

**AT&T'S OBJECTIONS TO BELL SOUTH'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-3)**

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

DOCUMENT NUMBER-DATE

06939 JUL 10 6

FPSC-RECORDS/REPORTING

of Civil Procedure, hereby submits the following Objections to BellSouth Telecommunications, Inc.'s (hereinafter "BellSouth") First Request for Production of Documents (Nos. 1 - 3) to AT&T Communications of the Southern States, Inc.

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-97-0721-PCO-TP issued by the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced docket on June 19, 1997. Should additional grounds for objection be discovered as AT&T prepares its Responses to the above-referenced set of requests, AT&T reserves the right to supplement, revise, or modify its objections at the time that it serves its Responses on Staff. Moreover, should AT&T determine that a Protective Order is necessary with respect to any of the material requested by Staff, AT&T reserves the right to file a motion with the Commission seeking such an order at the time that it serves its Responses on Staff.

General Objections

AT&T makes the following General Objections to BellSouth's First Request for Production of Documents which will be incorporated by reference into AT&T's specific responses when its Responses are served on BellSouth.

1. AT&T objects to paragraph 4 of the "Definitions and Instructions" section of the Requests for Production of Documents to the extent that the definitions of "you", "your", "Company" or "AT&T" 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, responses will be provided on behalf of AT&T Communications of the Southern States, Inc. which is the entity certificated to provide regulated telecommunications services in Florida and which is a party to this docket. All references to "AT&T" in responding to the requests for production of documents should be taken to mean AT&T Communications of the Southern States, Inc.

2. AT&T has interpreted BellSouth's requests to apply to AT&T's regulated intrastate operations in Florida and will limit its responses accordingly. To the extent that any 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 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 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 responses provided by AT&T in response to these requests will be provided subject to, and without waiver of, the foregoing objection.

5. AT&T objects to each and every 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 BellSouth'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.

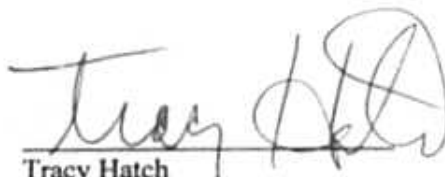
8. AT&T objects to each and every request, general instruction, or definition insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. AT&T objects to each and every 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 the requests seek proprietary confidential business information which is not the subject of the "trade secrets" privilege, AT&T will make such information available to counsel for BellSouth pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

10. AT&T is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, AT&T 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 and are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that every document may not be provided in response to these discovery requests. Rather, these responses will provide all of the information obtained by AT&T after a reasonable and diligent search conducted in connection with this discovery request. AT&T is complying with BellSouth'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, AT&T objects on the grounds that compliance would impose an undue burden or expense.

RESPECTFULLY SUBMITTED this 10th day of June, 1997.

A handwritten signature in cursive script, appearing to read "Tracy Hatch", written over a horizontal line.

Tracy Hatch
101 N. Monroe St.
Suite 700
Tallahassee, FL 32301
(904) 425-6364

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

CERTIFICATE OF SERVICE

DOCKET NOS. 970172-TP, 970173-TP & 970281-TL

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 10th day of January, 1997:

Nancy White, Esq.
C/o Nancy H. Sims
BellSouth Telecommunications
150 S. Monroe St., Suite 400
Tallahassee, FL 32301

Richard Melson, Esq.
Hopping Boyd Sams and Smith
P. O. Box 6526
Tallahassee, FL 32314

William Cox, Esq.
Division of Legal Services
Florida Public Service Comm.
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

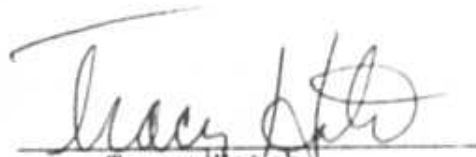
Angela Green, Esq.
FL Public Telecommunications
125 S. Gadsden St., Suite 200
Tallahassee, FL 32301-1525

Michael Henry, Esq.
MCI Telecommunications
780 Johnson Ferry Rd., #700
Atlanta, GA 30342

Martha Brown, Esq.
Division of Legal Services
Florida Public Service Comm.
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Charles Rehwinkel, Esq.
Sprint-Florida, Inc.
P. O. Box 2214 - (MC 2565)
Tallahassee, FL 32301

Ms. Beverly Menard
GTE Florida, Incorporated
106 E. College Ave., Ste. 1440
Tallahassee, FL 32301


Tracy Hatch