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August 11, 1997

HAND DELIVERED

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

Re: Docket No. 960786-TP, In re: Consideration of BellSouth Telecommunications, Inc. entry into InterLATA services pursuant to Section 271 of the Federal Telecommunications Act of 1996

Dear Ms. Bayo:

Enclosed for filing and distribution are the original and fifteen copies of the Florida Competitive Carriers Association's Objections to BellSouth Telecommunication, Inc.'s First Set of Interrogatories in the above docket.

Please acknowledge receipt of the above on the extra copy enclosed herein and return it to me. Thank you for your assistance.

Sincerely,

Joseph A. McGlothlin

- ACK
- AFA
- APP
- CAF
- CML *Green*
- CTR
- EAG
- LEG *2*
- LIN *5*
- OPC JAM/sjm
- RCH Enclosure
- SEC *1*
- WAS
- OTH

RECEIVED & FILED
EPSC-BUREAU OF RECORDS

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EPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of BellSouth)
Telecommunications, Inc. entry into) Docket No. 960786-TL
InterLATA services pursuant to Section)
271 of the Federal Telecommunications)
Act of 1996.)
_____)

**FLORIDA COMPETITIVE CARRIERS ASSOCIATION'S
OBJECTIONS TO BELL SOUTH TELECOMMUNICATIONS, INC.'S
FIRST SET OF INTERROGATORIES**

The Florida Competitive Carriers Association (FCCA) hereby submits the following Objections to BellSouth Telecommunications, Inc.'s First Set of Interrogatories to Florida Competitive Carriers Association.

1. For each member that is providing telephone exchange service to residential subscribers other than through resale of BellSouth Services, identify:

- (a) for each month to date in 1997, the number of residential subscribers and the number of subscriber lines by city in Florida, separately identifying the number of subscribers and lines for which the member charges a fee and those for which it does not;
- (b) for each month to date in 1997, total monthly billings for residential service;
- (c) the network arrangements for providing residential telephone exchange service, separately identifying network arrangements where they differ;
- (d) all network facilities that are used to provide residential telephone exchange service, including whether each facility is owned, leased or purchased.


FCCA objects to this interrogatory. FCCA does not possess or control the requested information. The FCCA is an entity separate from its members, is not itself a provider of telecommunication services, and does not possess or control business records or data -- much of which is considered by the carriers to be confidential and proprietary -- belonging to the individual members. (One member is itself an association that is an entity separate from its members. With respect to that member, the discovery is twice removed from the carrier(s) engaged in telecommunications services and so is doubly objectionable.) To the extent the interrogatory attempts to require FCCA to obtain information concerning the business operations of individual

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FPSC-RECORDS/REPORTING

members -- information it does not control or possess -- the interrogatory exceeds the permissible scope of discovery and would be burdensome and oppressive. FCCA notes that several of its members are parties to this proceeding, and have been served with the same interrogatories.


Joseph A. McGlothlin
Attorney for Florida Competitive
Carriers Association

2. For each member that is providing telephone exchange service to business subscribers other than through resale of BellSouth services, identify:

- (a) for each month to date in 1997, the number of business subscribers and the number of subscriber lines by city in Florida, separately identifying the number of subscribers and lines for which the member charges a fee and those for which it does not;
- (b) for each month to date in 1997, total monthly billings for business service;
- (c) separately the number of customers, lines and billings in multiple-family dwelling units and in single-family;
- (d) the network arrangements for providing business telephone exchange service, separately identifying network arrangements where they differ;
- (e) all network facilities that are used to provide business telephone exchange service, including whether each facility is owned, leased or purchased.

FCCA objects to this interrogatory. FCCA does not possess or control the requested information. The FCCA is an entity separate from its members, is not itself a provider of telecommunication services, and does not possess or control business records or data -- much of which is considered by the carriers to be confidential and proprietary -- belonging to the individual members. (One member is itself an association that is an entity separate from its members. With respect to that member, the discovery is twice removed from the carrier(s) engaged in telecommunications services and so is doubly objectionable.) To the extent the interrogatory attempts to require FCCA to obtain information concerning the business operations of individual members -- information it does not control or possess -- the interrogatory exceeds the permissible scope of discovery and would be burdensome and oppressive. FCCA


notes that several of its members are parties to this proceeding, and have been served with the same interrogatories.


Joseph A. McGlothlin
Attorney for Florida Competitive
Carriers Association

3. For each member that provides residential telephone exchange service through resale of BellSouth Services, identify:

- (a) for each month to date in 1997, the number of subscribers, the number of resold lines by city in Florida, separately identifying the number of subscribers and lines for which the member charges a fee and those for which it does not;
- (b) for each month to date in 1997, total monthly billings;
- (c) list all services and features resold.

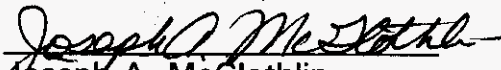
FCCA objects to this interrogatory. FCCA does not possess or control the requested information. The FCCA is an entity separate from its members, is not itself a provider of telecommunication services, and does not possess or control business records or data -- much of which is considered by the carriers to be confidential and proprietary -- belonging to the individual members. (One member is itself an association that is an entity separate from its members. With respect to that member, the discovery is twice removed from the carrier(s) engaged in telecommunications services and so is doubly objectionable.) To the extent the interrogatory attempts to require FCCA to obtain information concerning the business operations of individual members -- information it does not control or possess -- the interrogatory exceeds the permissible scope of discovery and would be burdensome and oppressive. FCCA notes that several of its members are parties to this proceeding, and have been served with the same interrogatories.


Joseph A. McGlothlin
Attorney for Florida Competitive
Carriers Association

4. For each member that provides business telephone exchange service through resale of BellSouth services, identify:

- (a) for each month to date in 1997, the number of subscribers, the number of resold lines by city in Florida, separately identifying the number of subscribers and lines for which the member charges a fee and those for which it does not;
- (b) for each month to date in 1997, total monthly billings;
- (c) list all services and features resold.

FCCA objects to this interrogatory. FCCA does not possess or control the requested information. The FCCA is an entity separate from its members, is not itself a provider of telecommunication services, and does not possess or control business records or data -- much of which is considered by the carriers to be confidential and proprietary -- belonging to the individual members. (One member is itself an association that is an entity separate from its members. With respect to that member, the discovery is twice removed from the carrier(s) engaged in telecommunications services and so is doubly objectionable.) To the extent the interrogatory attempts to require FCCA to obtain information concerning the business operations of individual members -- information it does not control or possess -- the interrogatory exceeds the permissible scope of discovery and would be burdensome and oppressive. FCCA notes that several of its members are parties to this proceeding, and have been served with the same interrogatories.


Joseph A. McGlothlin
Attorney for Florida Competitive
Carriers Association

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Florida Competitive Carriers Association's Objections to BellSouth Telecommunications Inc.'s First Set of Interrogatories has been furnished by U.S. Mail, by hand delivery(*), or by overnight delivery(**) on this 11th day of August, 1997, to the following:

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