Legal Department

J. PHILLIP CARVER General Attorney

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (404)335-0710

August 22, 1997

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

RE: Docket No. 960786-TL

Dear Mrs. Bayo:

Enclosed is an original and fifteen copies of BellSouth's Response and Objections to AT&T's First Interrogatories. We ask that this be filed in the captioned matter.

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.

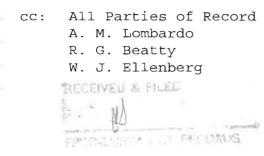
Sincerely,

Up Cawery J. Phillip Carver

and for the

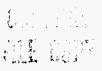
Enclosures

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DOCUMENT NUMBER-DATE 08526 AUG 22 5 FPSC-RECORDS/REPORTING

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## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth Telecommunications, Inc.'s entry into interLATA services pursuant to Section 271 of the Federal Telecommunications Act of 1996

Docket No. 960786-TL

Filed: August 22, 1997

## BELLSOUTH'S RESPONSE AND OBJECTIONS TO AT&T'S FIRST INTERROGATORIES

BellSouth Telecommunications, Inc.'s ("BellSouth"), hereby files its responses and objections to the First Interrogatories of AT&T and states the following:

## **GENERAL OBJECTIONS**

<u>General Objection Number One</u>: BellSouth objects to Interrogatory Nos. 1-9, 14, 18, 21, 25, 26, 27, 28, 29, 30, and 31 in that they are unduly burdensome, overbroad, and call for disclosure of information that is not relevant, nor calculated to lead to discoverable evidence.

The above-referenced Interrogatories can only be answered by reviewing every Order received from any CLEC by BellSouth during the last seven months in the entire nine state region in which BellSouth provides service. This would involve reviewing approximately eight thousand Orders. To answer these interrogatories, it would be necessary, after reviewing these Orders, to analyze each one and provide responsive information. To answer many of these would

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DOCUMENT NUMBER-DATE D 8 5 2 6 AUG 22 5 FPSC-RECORDS/REPORTING require a separate analysis for each of several sub-parts. Moreover, these interrogatories would require BellSouth to then separate out the Orders that relate to Florida and perform the same (in many instances, multi-part) analysis. Inasmuch as these Orders are not currently maintained on a state-by-state basis, this would require the additional task of sorting through the approximately eight thousand Orders to locate the ones that relate to Florida. In light of the foregoing, this process is, without question, unduly burdensome.

Moreover, this extremely burdensome task of locating and reviewing voluminous documentation would have to be performed by those personnel working in, or supporting the functions of, the BellSouth operations that are currently dedicated to providing service on a timely basis to ALECs. Given the scope and the magnitude of the requests and the timeframe in which AT&T has demanded a response, these personnel would have to virtually abandon all of the functions to which they are dedicated in order to answer these requests. This request, therefore, is not only burdensome, but patently unreasonable given the circumstances.

<u>General Objection Number Two</u>: BellSouth objects to answering each of the above-mentioned interrogatories as well as interrogatory Nos. 10, 11, 15, 23, 24 and 32 to the extent that they require the disclosure of information that is not related to Florida. As set forth previously in BellSouth's general objection filed on August 18, 1997, the pertinent issues in this case relate to whether the fourteen point checklist has been met in <u>Florida</u>. The status of BellSouth's

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efforts to serve ALECs in other portions of its region are not properly at issue. Given the lack of relevance of this portion of the discovery, combined with its extreme burdensome nature, BellSouth should not be required to produce any responsive information as states to other than Florida.

BellSouth has been unable in the time provided to finalize its responses to the interrogatories to which it has not objected, but will do so at the earliest opportunity. Accordingly, responses will be provided that contain Florida specific information to interrogatory numbers 10, 11, 12, 13, 15, 16, 17, 19, 22, 23, 24, 32 and 34. These will be provided as early as possible in the week beginning Monday, August 25, 1997.

Respectfully submitted this 22nd day of August, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

Beatty AN ROBERT G. BEATTY

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WILLIAM J. ELLENBERG II J. PHILLIP CARVER 675 West Peachtree Street, #4300 Atlanta, Georgia 30375 (404) 335-0710

## CERTIFICATE OF SERVICE DOCKET NO. 960786-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express this 22nd day of August, 1997 to the following: Mr. Brian Sulmonetti C. Everett Boyd, Jr. LDDS WorldCom Communications Ervin, Varn, Jacobs, Odom & Ervin Suite 400 1515 S. Federal Highway 305 South Gadsden Street Boca Raton, FL 33432 P.O. Drawer 1170 (407) 750-2529 Tallahassee, FL 32302 Atty. for Sprint (904) 224-9135 Floyd R. Self, Esq. Norman H. Horton, Esq. Messer, Caparello, Madsen, Benjamin W. Fincher Goldman & Metz, P.A. 3100 Cumberland Circle 215 South Monroe Street Atlanta, Georgia 30339 Atty. for Sprint Suite 701 P.O. Box 1876 (404) 649-5145 Tallahassee, FL 32302-1876 Atty. for LDDS WorldCom Comm. Monica Barone (904) 222-0720 Florida Public Service Commission Joseph A. McGlothlin Division of Legal Services Vicki Gordon Kaufman 2540 Shumard Oak Boulevard McWhirter, Reeves, McGlothlin, Tallahassee, FL 32399-0850 Davidson, Rief & Bakas, P.A. 117 South Gadsden Street Patrick K. Wiggins, Esq. Tallahassee, Florida 32301 Donna L. Canzano, Esq. Atty. for FCCA Wiggins & Villacorta, P.A. (904) 222-2525 501 East Tennessee Street Suite B Thomas K. Bond Post Office Drawer 1657 MCI Telecommunications Corp. Tallahassee, Florida 32302 Tel. (904) 222-1534 Fax. (904) 222-1689 780 Johnson Ferry Road Suite 700 Atlanta, GA 30342 Attys. for Intermedia (404) 267-6315 Patricia Kurlin Richard D. Melson Intermedia Comm., Inc. Hopping Green Sams & Smith 3625 Queen Palm Drive 123 South Calhoun Street Tampa, Florida 33619-1309 P.O. Box 6526 (813) 829-0011

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