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December 15, 1997

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

Re: Docket 970882-T1

Dear Ms. Bayo:

Please find enclosed for filing in the above-referenced docket an original and 15 copies of AT&T Communications of the Southern States, Inc's Preliminary Objections to the Second Request for Production of Documents by the Attorney General and the Citizens of Florida as well as an original and 15 copies of AT&T Communications of the Southern States, Inc's Preliminary Objections to the First Set of Interrogatories by the Attorney General and the Citizens of Florida.

Please return a stamped copy of this letter to me as proof of filing.

Thank you.

Sincerely,

Tracy Hatch

- ACK
- AFA _____
- APP Cathwell
- CAF 2
- CMU 2
- CTR _____
- EAG _____
- LEG _____
- LIN 5
- JPC _____
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FPSC-RECORDS & REPORTING

1st Set
DOCUMENT NUMBER-DATE
12792 DEC 15 97
FPSC-RECORDS/REPORTING

2nd Set
DOCUMENT NUMBER-DATE
12793 DEC 15 97
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed Rule 25-24.845, F.A.C.)
Customer Relations; Rules Incorporated,)
and proposed amendments to Rules)
25-4.003, F.A.C., Definitions; 25-4.110,)
F.A.C., Customer Billing; 25-4.118, F.A.C.,)
Interexchange Carrier Selection; 25-24.490,)
F.A.C., Customer Relations; Rules)
Incorporated.)

Docket No. 970882-TI

Filed: 12-15-97

**AT&T'S PRELIMINARY OBJECTIONS TO THE FIRST SET
OF INTERROGATORIES TO AT&T BY THE
ATTORNEY GENERAL AND THE CITIZENS OF FLORIDA**

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 of Civil Procedure, hereby submits the following preliminary objections to the First Set of Interrogatories to AT&T Communications of the Southern States, Inc. filed by the Office of the Public Counsel (OPC) on December 5, 1997. AT&T will submit its final objections when it files its response to OPC's First Set of Interrogatories on or before January 5, 1997.

GENERAL OBJECTIONS

1. AT&T objects to the definitions of "you," "your," and "AT&T" to the extent such definitions 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, and 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

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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 interrogatories should be taken to mean AT&T Communications of the Southern States, Inc.

2. AT&T has interpreted OPC's interrogatories 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 interrogatories 1 through 21 to the extent that such interrogatories call 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 the use of the term "slamming" throughout these interrogatories on the grounds that the term is undefined, and therefore vague and ambiguous. Without waiving these objections, AT&T interprets the term "slamming" to mean a PIC dispute in which a customer complains that his/her/its PIC was changed without authorization.

5. AT&T objects to these interrogatories to the extent that they assume that AT&T has engaged in slamming.

7. AT&T objects to each and every interrogatory to the extent that it seeks information that AT&T is prohibited from disclosing pursuant to Section 364.24, Florida Statutes.

OBJECTIONS TO SPECIFIC INTERROGATORIES

Interrogatories 6, 8, 9: AT&T objects to these interrogatories to the extent that the information requested includes proprietary, confidential business information.

Interrogatory 10 & 11: AT&T objects to this interrogatory in that the terms "process billing" and "casual calling" are undefined and therefore vague and ambiguous.

Interrogatories 11, 13, 16-21: AT&T objects to these interrogatories to the extent that the information requested includes proprietary, confidential business information.

SUBMITTED this 15th day of December, 1997.



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(904) 425-6365

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

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished by U.S. Mail this 15th
day of December, 1997, to:

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Office of the Public Counsel
c/o The Florida Legislature
111 West Madison Street
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Tallahassee FL 32399-1400

Michael A. Gross

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Tallahassee, FL 32399-1050**

**Diana Caldwell
Division of Appeals
Florida Public Service Commission
2540 Shumard Oak Blvd.
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Marsha E. Rule

CERTIFICATE OF SERVICE

Docket No. 970882-T1

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U.S. Mail this 15th day of December, 1997, to the following parties:

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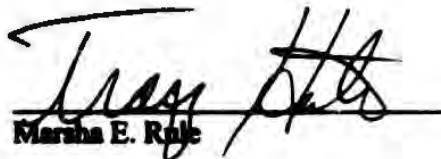
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