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BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

RECORDS AND  
REPORTING

Docket No.: 000075-TP  
Filed: February 12, 2001

In re: Investigation into appropriate methods  
to compensate carriers for exchange of  
traffic subject to Section 251 of the  
Telecommunications Act of 1996.

FCCA'S OBJECTIONS TO  
BELLSOUTH'S FIRST SET OF INTERROGATORIES

**General Objections.** FCCA objects to the instructions contained in BellSouth's First Set of Interrogatories, to the extent the instructions purport to impose obligations greater than those associated with the applicable rules of discovery. Specifically, FCCA objects to the attempt of BellSouth to characterize the interrogatories as "continuing in nature." In addition, while FCCA is an industry association and as an entity does not own facilities or serve end users, such that many questions are not applicable to FCCA, FCCA notes that many of the requests are objectionable because they seek carrier-specific details which in FCCA's view would be irrelevant to the resolution of the policy issues being addressed in this docket.

Objections to Specific Interrogatories

4. Identify all documents which refer or relate to any issue raised in Phase I of the Generic ISP Proceeding.

FCCA objects to Interrogatory no. 4 on the grounds that it is vague, overbroad, and unduly burdensome.

17. Does FCCA contend that there is a difference between the place where a call "terminates" for jurisdictional purposes and the place where a call "terminates" for reciprocal

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- CAF \_\_\_\_\_
- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- LEG / \_\_\_\_\_
- OPC \_\_\_\_\_
- PAI \_\_\_\_\_
- RGO \_\_\_\_\_
- SEC / \_\_\_\_\_
- SER \_\_\_\_\_
- OTH \_\_\_\_\_

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**compensation purposes? If the answer to the foregoing is in the affirmative, please: (a) explain in detail the distinction between call termination for jurisdictional and reciprocal compensation purposes; (b) state the date and describe the circumstances when FCCA first concluded that there was a distinction between call termination for jurisdictional and reciprocal compensation purposes; (c) state the date and describe the circumstances when FCCA first stated publicly that there was a distinction between call termination for jurisdictional and reciprocal compensation purposes; (d) identify all documents that refer or relate to or support a distinction between call termination for jurisdictional and reciprocal compensation purposes; (e) identify all internal FCCA memoranda or other documents that discuss, relate to or touch upon the issue of whether reciprocal compensation may be owed for calls delivered to ISPs.**

FCCA objects to subparts (b) and (c), on the grounds that the questions are irrelevant and are not reasonably calculated to lead to the discovery of admissible evidence. FCCA objects also on the grounds that the interrogatory is unduly burdensome. FCCA objects to subpart (d) and (e) on the grounds that the requests are vague, overbroad, and unduly burdensome. FCCA also objects to these subparts to the extent they would encroach on attorney client privilege and/or the work product privilege.

**19. Identify all state and federal legal authority that supports FCCA's contention that traffic to ISPs is local traffic.**

FCCA objects to Interrogatory 19 on the grounds that it is vague, overbroad, and unduly burdensome.



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## CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of FCCA's Objections to BellSouth's First Set of Interrogatories has been furnished this 12th day of February, 2001 to the following:

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