

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of the Florida
Competitive Carriers Association
Against BellSouth Telecommunications, Inc.
and Request for Expedited Relief

Docket No. 020507-TP

Filed: December 16, 2002

**THE FLORIDA COMPETITIVE CARRIERS ASSOCIATION'S
OBJECTIONS TO BELL SOUTH TELECOMMUNICATIONS, INC.'S SECOND SET OF
INTERROGATORIES (NOS. 33 – 36) AND SECOND REQUEST
FOR PRODUCTION OF DOCUMENTS (NO. 5)**

Pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.340 and 1.350, Florida Rules of Civil Procedure, the Florida Competitive Carriers Association (FCCA) files the following objections to BellSouth Telecommunications, Inc.'s (BellSouth) Second Set of Interrogatories (Nos. 33-36) and Second Request for Productions of Documents (No. 5). The objections stated herein are preliminary in nature and are made at this time to comply with the 10-day requirement set forth in Order No. PSC-02-1537-PCO-TL. Should additional grounds for objection be discovered as the FCCA prepares its answers, it reserves the right to supplement, revise or modify its objections at the time it serves its responses.

General Objections

1. The FCCA objects to any request that calls for information protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law, whether such privilege or protection appears at the time the response is first made, or is later determined to be applicable based on the discovery of documents, investigation or analysis. FCCA in no way intends to waive any such privilege or protection.

2. In certain circumstances, the FCCA may determine upon investigation and analysis that information responsive to certain requests to which objections are not otherwise asserted are confidential and proprietary and should not be provided at all or should be provided

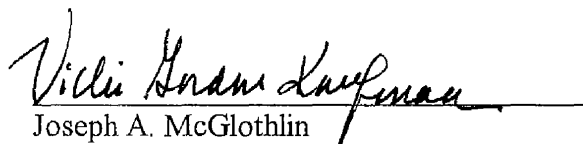
only under an appropriate confidentiality agreement and protective order. By agreeing to provide such information, the FCCA is not waiving its right to insist upon appropriate protection of confidentiality by means of a confidentiality agreement and protective order. FCCA hereby asserts its right to require such protection of any and all information or documents that may qualify for protection under the Florida Rules of Civil Procedure and other applicable statutes, rules and legal principles.

3. The FCCA objects to these requests and any definitions or instructions that purport to expand the FCCA's obligations under applicable law. The FCCA will comply with applicable law.

4. The FCCA objects to these requests to the extent they purport to require FCCA to conduct an analysis or create information not prepared by FCCA's experts or consultants in their preparation for this case. The FCCA will comply with its obligations under the applicable rules of procedure.

5. The FCCA objects to any request that requires the identification of "all" or "each" responsive document or fact, as it can not guarantee, even after a good faith and reasonably diligent attempt, that "all" or "each" responsive document or fact will be identified.

6. The FCCA objects to providing information or documents to the extent they are in the public record or in the possession of BellSouth.



Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman & Arnold, PA
117 South Gadsden Street
Tallahassee, Florida 32301
(850) 222-2525 Telephone
(850) 222-5606 Telefax

Attorneys for the Florida Competitive
Carriers Association

CERTIFICATE OF SERVICE

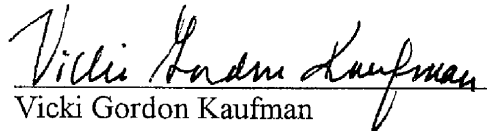
I **HEREBY CERTIFY** that a true and correct copy of the foregoing Florida Competitive Carriers Association's Objections to BellSouth Telecommunications, Inc.'s Second Set of Interrogatories (Nos. 33-36) and Second Request for Productions of Documents (No. 5) has been furnished by (*) hand delivery, (**) electronic mail, or U.S. Mail this 16th day of December 2002, to the following:

(*) (**) Patricia Christensen
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

(*) (**) Nancy White
(**) Meredith Mays
c/o Nancy Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301-1556

(**) Floyd R. Self
215 South Monroe Street, Suite 701
Tallahassee, Florida 32301

(**) Nanette Edwards
Director-Regulatory
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, AL 35802


Vicki Gordon Kaufman