

ORIGINAL

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March 10, 2003

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

Re: Docket Nos. 981834-TP and 990321-TP (Generic Collocation)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Objections to AT&T's Third Set of Interrogatories and Second Request for Production of Documents, which we ask that you file in the captioned docket.

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 to the parties shown on the attached Certificate of Service.

Sincerely,

J. Phillip Carver

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Nancy B. White

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CERTIFICATE OF SERVICE
Docket No. 981834-TP and 990321-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via First Class U.S. Mail, Facsimile (*), and Electronic Mail this 10th day of March, 2003 to the following:

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(+) Signed Protective Agreement

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive)
Carriers for Commission Action) Docket No. 981834-TP
To Support Local Competition)
In BellSouth's Service Territory)

In re: Petition of ACI Corp. d/b/a)
Accelerated Connections, Inc. for) Docket No. 990321-TP
Generic Investigation into Terms and)
Conditions of Physical Collocation)
_____) Filed: March 10, 2003

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
OBJECTIONS TO AT&T'S THIRD SET OF INTERROGATORIES
AND SECOND REQUEST FOR PRODUCTION OF DOCUMENTS**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 28-106.206, Florida Administrative Code and Rules 1.340 and 1.280, Florida Rules of Civil Procedure, hereby files the following Objections to AT&T's Third Set of Interrogatories and Second Request for Production of Documents, dated February 26, 2003.

The objections stated herein are preliminary in nature and are made at this time to comply with the requirement set forth in Order No. PSC-02-1513-PCO-TP issued on November 4, 2002, by the Florida Public Service Commission ("Commission"). Should additional grounds for objection be discovered as BellSouth prepares its answers to the above-referenced Interrogatories and Requests, BellSouth reserves the right to supplement, revise, or modify its objections at the time it serves its responses.

GENERAL OBJECTIONS

1. BellSouth objects to each Production Request and Interrogatory to the extent that it seeks to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such Interrogatory or Request is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. BellSouth objects to each Production Request and Interrogatory to the extent that it is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission. BellSouth objects to each such Interrogatory and Request as being irrelevant, overly broad, unduly burdensome, and oppressive.

3. BellSouth objects to each Production Request and Interrogatory to the extent that it requests information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. BellSouth objects to each Production Request and Interrogatory to the extent that it is vague, ambiguous, overly broad, imprecise, or to the extent that it utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of this discovery. Any answers provided by BellSouth in response to these Interrogatories and Production Requests will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth objects to each Production Request and Interrogatory to the extent that it is not reasonably calculated to lead to the discovery of admissible

evidence and is not relevant to the subject matter of this action. BellSouth will attempt to note in its responses each instance where this objection applies.

6. BellSouth objects to providing information to the extent that such information is already in the public record before the Commission.

7. BellSouth objects to each Production Request and Interrogatory to the extent that it seeks to impose obligations on BellSouth that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

8. BellSouth objects to each Production Request and Interrogatory to the extent that responding to it would be unduly burdensome, expensive, oppressive, or excessively time consuming.

9. BellSouth objects to each Production Request and Interrogatory to the extent that it is not limited to any stated period of time and, therefore, is overly broad and unduly burdensome.

10. BellSouth is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, BellSouth creates countless documents that are not subject to Commission or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. BellSouth will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the Production Requests or Interrogatories purport to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

SPECIFIC OBJECTIONS

11. BellSouth objects to Interrogatory Nos. 25, 28, 29, and 31, and to Production Request Nos. 14, 19, 21, 24, and 31 because each seeks information that is not relevant to any issue in this proceeding and is not reasonably calculated to lead to admissible evidence. For each interrogatory, AT&T inquires as to the average distance (or length) of the cable racking used by BellSouth for a particular type of cable. The pertinent issue in this proceeding is, of course, the appropriate cost-based rates to provide certain elements of collocation to collocators. The average distance of BellSouth racking for its own facilities is not comparable to the distance for collocators, and, therefore, not relevant. BellSouth objects to each of the above-referenced production requests for the same reason.

12. BellSouth also objects to each interrogatory referenced above because they are unduly burdensome. As stated above, each interrogatory purports to require BellSouth to provide the average distance of cable racking utilized by BellSouth for a particular type of cable. BellSouth does not retain data concerning the average distance of cable racking or the average length of cable support structure used by BellSouth in its existing network in Florida. Such information could only be derived by manually reviewing the floor plans and detailed engineering drawings for each of the 202 BellSouth central offices in Florida, and manually calculating the distances for each of the network equipment configurations that are the subject of AT&T's discovery. BellSouth should not be forced to sustain this unreasonable burden, especially when the result of this laborious undertaking would be to develop information that has no relevance to this proceeding.

13. BellSouth also objects to Production Request No. 19 because it purports to require BellSouth to provide an average distance for cable racking. Although this request is improper for the reasons set forth above (in reference to Interrogatory Nos. 25, 28, 29 and 31), it is also improper because it seeks to force BellSouth to create a document that does not exist within the context of a request to produce documents. A production request can not properly be utilized for this purpose.

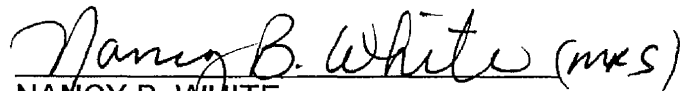
14. BellSouth objects to Interrogatory No. 32 and Production Request No. 31 because they are unduly burdensome. This interrogatory purports to require BellSouth to "indicate the utilization of BellSouth's Support Structure for copper entrance facilities in its own network." Thus, the interrogatory would appear to require BellSouth to provide this information for each of the 202 BellSouth central offices in Florida. BellSouth does not retain this data. This information could only be derived by manually collecting the information for each of the 202 BellSouth central offices in Florida, a task that is clearly unwarranted and burdensome.

15. BellSouth also objects to this interrogatory because the information sought is not relevant to any issue in this proceeding and is not calculated to lead to admissible evidence. The extent to which support structure is utilized in a given central office changes constantly. Thus, the percentage of utilization at any given moment in any given location is not relevant to any issue in this case. BellSouth should not be required to perform this exhaustive and labor intensive survey of information for over 200 central offices, particularly when the result of the effort would be to develop essentially irrelevant information.

16. Production Request No. 31 relates to documents to support Interrogatory No. 32, and BellSouth objects to this request for the reasons set forth above.

Respectfully submitted this 10th day of March, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE

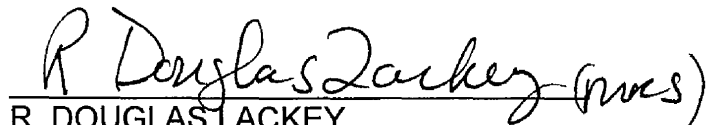
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