

ORIGINAL

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March 31, 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 Staff's Third Set of Interrogatories and Fourth 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
J. Phillip Carver (KA)

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 Hand Delivery (#), First Class U.S. Mail, and Electronic Mail this 31st day of March, 2003 to the following:

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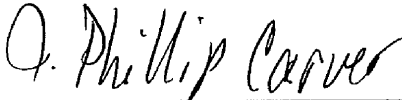
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J. Phillip Carver (CA)

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for Commission Action To Support Local Competition In BellSouth's Service Territory))	Docket No. 981834-TP
In re: Petition of ACI Corp. d/b/a Accelerated Connections, Inc. for Generic Investigation into Terms and Conditions of Physical Collocation))	Docket No. 990321-TP
_____))	Filed: March 31, 2003

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
OBJECTIONS TO STAFF'S THIRD SET OF INTERROGATORIES
AND FOURTH 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 Staff's Third Set of Interrogatories and Fourth Request for Production of Documents, dated March 21, 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 OBJECTION

BellSouth objects to Staff's Request No. 26 because it is burdensome. Specifically, BellSouth estimates that it would take at least 300 hours to compile the requested architectural drawings, and perhaps considerably longer. This effort would require BellSouth to compile approximately 560 sets of drawings for the BellSouth central offices having collocation. Each set would, on average, consist of 10 pages.

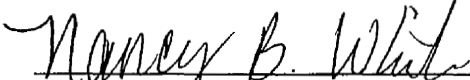
BellSouth, however, will agree to produce study drawings as an alternative to producing architectural drawings. The difference between study drawings and "architectural" drawings is as follows: Study drawings show an overhead picture of each floor of a building, and are used as a reference on how the space is used. There are two types of study drawings. Architectural study drawings, which BellSouth refers to as "A" drawings, show the footprint of the building, interior partitions, room identifications, ALEC identifications, and corridors. Network equipment drawings, which BellSouth refers to as "N" drawings, show the telephone and power equipment layout in the building. Both types of study drawings are also used to produce red line drawings to be used by consultants when modifications in the building are needed.

Architectural drawings, on the other hand, are drawings used to depict the constructability of a new building, building additions, renovations, or modifications. These drawings are much more detailed, and are produced by architects, mechanical and electrical engineers, and other engineers as required to show how a new building, addition, renovation or modification is to be constructed. These drawings do not show how the space is utilized (e.g. equipment layouts).

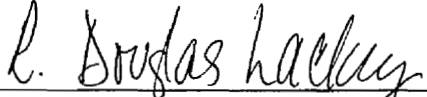
The study drawings can be compiled for production with considerably less labor than would be required to make the burdensome production of architectural drawings. Moreover, BellSouth believes that the study drawings contain the information that is relevant to the issues in this proceeding.

Respectfully submitted this 31st day of March, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.



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