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July 14, 2003

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COMMISSION  
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**BY HAND DELIVERY**

Ms. Blanca Bayó, Director  
The Commission Clerk and Administrative Services  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

Re: Petition by AT&T Communications of the Southern States, LLC and TCG South Florida for Arbitration of Interconnection Agreement with Sprint-Florida, Incorporated Under the Telecommunications Act of 1996  
Docket No.: ~~020396-TP~~

*030296-TP R.V.N.*

Dear Ms. Bayó:

Enclosed for filing an original and 15 copies of AT&T Communications of the Southern States, LLC's General Objections to Staff's First Set of Interrogatories and First Request of Production of Documents in the above-referenced docket.

Please acknowledge receipt of this letter by stamping the extra copy of this letter "filed" and returning the same to Lisa Riley in the enclosed stamped envelope.

Thank you for your assistance with this filing.

Sincerely yours,

*Tracy Hatch/las*  
Tracy W. Hatch

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- OTH \_\_\_\_\_

TWH/las  
Enclosure  
cc: Parties of Record

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER DATE

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FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Petition for Arbitration of )  
Unresolved Issues Resulting From ) Docket No.: 030296-TP  
Negotiations with Sprint-Florida, )  
Inc. for Interconnection Agreement, )  
By AT&T Communications of the ) Filed: July 14, 2003  
Southern States, LLC d/b/a AT&T )  
And TCG South Florida )

**AT&T OBJECTIONS TO STAFF'S FIRST SET OF  
INTERROGATORIES (NOS. 1-8)**

AT&T Communications of the Southern States, Inc. and TCG South Florida ("AT&T"), pursuant to Rules 25-22.034 and 25-22.035, Florida Administrative Code and Rules 1.340 and 1.280(b), Florida Rules of Civil Procedure, hereby submit the following Objections to Staff's First Set of interrogatories (Nos. 1-8).

**I. OVERVIEW.**

1. These AT&T Objections are preliminary in nature and are made for the purpose of complying with the five (5) day requirement set forth in Order No. PSC-03-0692-PCO-TP issued by the Florida Public Service Commission ("Commission") in this proceeding on June 9, 2003. Should additional grounds for Objections be discovered as AT&T prepares its responses, AT&T reserves the right to supplement, revise, or modify these Objections at the time that AT&T provides its responses to the Interrogatories.

## **II. GENERAL OBJECTIONS.**

AT&T makes the following general Objections to Staff's Interrogatories which will be incorporated by reference into AT&T's specific responses, where provided, when AT&T responds to the Interrogatories.

1. AT&T objects to each and every Interrogatory insofar as the request calls for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

2. AT&T objects to each and every Interrogatory insofar as the request is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations, but are not properly defined or explained for purposes of these Interrogatories. Where provided, responses provided by AT&T to Staff's Interrogatories will be provided subject to, and without waiving, this general Objection.

3. AT&T objects to each and every Interrogatory insofar as the request is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this proceeding.

4. AT&T objects to each and every Interrogatory insofar as the request exceeds the requirements of the Florida Rules of Civil Procedure or Florida law.

5. AT&T objects to responding to any Interrogatory insofar as the request seeks responsive information already is in the public domain, or

otherwise on record with the Commission or the Federal Communications Commission ("FCC").

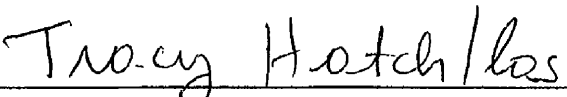
6. AT&T objects to each and every Interrogatory insofar as the request is unduly burdensome, expensive, oppressive, or excessively time consuming for response thereto as written.

7. AT&T objects to each Interrogatory insofar as the request seeks responsive information which constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. Insofar as the request seeks proprietary business information which is not subject to a "trade secrets" privilege, and AT&T makes such responsive information available to Staff, AT&T only will make responsive information available to counsel for Staff pursuant to an appropriate Protective Agreement, and subject to any requirements of the Commission relative to protecting such proprietary business information.

8. AT&T is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, AT&T creates numerous documents that are not subject to either Commission or FCC retention of records requirements. These documents are kept in numerous locations and are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is impossible for AT&T to affirm that every responsive document in existence has been provided in response to an Interrogatory. Instead, where provided, AT&T's responses will provide all of the information obtained by AT&T after

a reasonable and diligent search conducted in connection the Interrogatory. Such search will include only a review of those files that are reasonably expected to contain the requested information. To the extent that the discovery request purports to require more, AT&T objects on the ground that compliance would be unduly burdensome.

Respectfully submitted this 14th day of July, 2003.

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TRACY W. HATCH, ESQ.  
101 N. Monroe Street  
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(850) 425-6360

Attorney for AT&T Communications of  
the Southern States, LLC

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Petition for Arbitration of )  
Unresolved Issues Resulting From ) Docket No.: 030296-TP  
Negotiations with Sprint-Florida, )  
Inc. for Interconnection Agreement, )  
By AT&T Communications of the ) Filed: July 14, 2003  
Southern States, LLC d/b/a AT&T )  
And TCG South Florida )

**AT&T OBJECTIONS TO STAFF'S FIRST REQUEST FOR  
PRODUCTION OF DOCUMENTS (NOS. 1-2)**

AT&T Communications of the Southern States, Inc. and TCG South Florida ("AT&T"), pursuant to Rules 25-22.034 and 25-22.035, Florida Administrative Code and Rules 1.340 and 1.280(b), Florida Rules of Civil Procedure, hereby submit the following Objections to Staff's First Request for Production of Documents (Nos. 1-2).

**I. OVERVIEW.**

1. These AT&T Objections are preliminary in nature and are made for the purpose of complying with the five (5) day requirement set forth in Order No. PSC-03-0692-PCO-TP issued by the Florida Public Service Commission ("Commission") in this proceeding on June 9, 2003. Should additional grounds for Objections be discovered as AT&T prepares its responses, AT&T reserves the right to supplement, revise, or modify these Objections at the time that AT&T provides its responses to the Requests.

**II. GENERAL OBJECTIONS.**

AT&T makes the following general Objections to the Request for

Production of Documents which will be incorporated by reference into AT&T's specific responses, where provided, when AT&T responds to the Request for Production of Documents.

1. AT&T objects to Staff's First Request for Production of Documents to the extent that it is overly broad, unduly burdensome, oppressive, not permitted by applicable discovery rules, and would require AT&T to disclose information which is privileged.

2. AT&T has interpreted Staff's requests 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 each and every request and instruction to the extent that such request or instruction calls 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 each and every request insofar as the request is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these requests. Any Responses provided by AT&T in response

to Staff's requests will be provided subject to, and without waiver of, the foregoing objection.

5. AT&T objects to each and every request insofar as the request is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. AT&T will attempt to note each instance where this objection applies.

6. AT&T objects to Staff's general instructions, definitions or specific discovery requests insofar as they seek to impose obligations on AT&T which exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

7. AT&T objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

8. AT&T objects to each and every request, general instruction, or definition insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. AT&T object to each and every request to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that Staff's requests seek proprietary confidential business information which is not the subject of the "trade secrets" privilege, AT&T will make such information



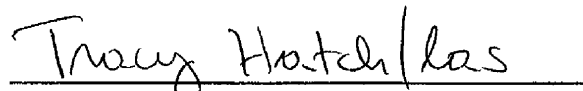
available to counsel for Staff pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

10. AT&T is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, AT&T create countless documents that are not subject to Florida Public Service Commission or FCC retention of records requirements. These documents are kept in numerous locations and are frequently moved from site to site as employees change jobs or as the business is reorganized. Rather, these responses will provide all of the information obtained by AT&T after a reasonable and diligent search conducted in connection with this discovery request. AT&T will comply with Staff's request that a search be conducted of those files that are reasonably expected to contain the requested information. To the extent that the discovery request purports to require more, AT&T object on the grounds that compliance would impose an undue burden or expense.

11. AT&T object to the definitions of "AT&T" to the extent that such definitions seek to impose an obligation on AT&T Communications of the Southern States, LLC to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case 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, Answers will be provided on behalf of AT&T Communications of the Southern States, LLC 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 Staff's requests should be taken to mean AT&T Communications of the Southern States, LLC.

Respectfully submitted this 14th day of July, 2003.



TRACY W. HATCH, ESQ.  
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(850) 425-6360

Attorney for AT&T Communications of  
the Southern States, LLC

CERTIFICATE OF SERVICE  
DOCKET NO. 030296-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served electronically and U.S. Mail this 14<sup>th</sup> day of July, 2003 to the following:

AT&T  
& TCG South Florida  
Ms. Lisa A. Riley  
1200 Peachtree Street, N.E., Ste. 8026  
Atlanta, GA 30309-3579  
Email: lisariley@att.com

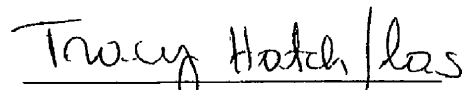
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