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ORIGINAL

September 8, 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 are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Objections to AT&T's Seventh Set of Interrogatories, 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 (JA)

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 8th day of September, 2003 to the following:

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(+) Signed Protective Agreement

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: September 8, 2003

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
OBJECTIONS TO AT&T'S SEVENTH SET OF INTERROGATORIES (NOS. 49-51)**

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 Seventh Set of Interrogatories, dated August 27, 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, 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 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 is

overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. BellSouth objects to each 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 as being irrelevant, overly broad, unduly burdensome, and oppressive.

3. BellSouth objects to each 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 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 will be provided subject to, and without waiver of, the foregoing objection.

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

9. BellSouth objects to each 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 Interrogatories purport to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

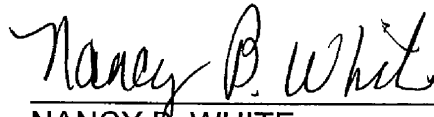
SPECIFIC OBJECTION

11. BellSouth specifically objects to each of AT&T's Seventh Set of Interrogatories (Nos. 49-51) because they are irrelevant. Each of the interrogatories go to the technical, power issues that were part of the first phase of this proceeding. The deadline for discovery relating to those issues has long since passed. These interrogatories are irrelevant to the cost issues that are within the proper scope of the second phase of the proceeding. AT&T previously filed a Motion to consolidate the

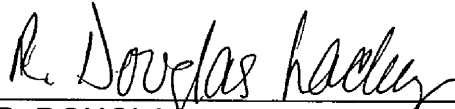
evidence in these two phases, and that request was denied by Order of the Commission. The latest interrogatories by AT&T appear to be yet another attempt by AT&T to interject into phase two issues that the Commission has already ruled do not belong.

Respectfully submitted this 8th day of September, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.



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