

ORIGINAL

Legal Department

J. Phillip Carver  
Senior Attorney

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0710

October 13, 2003

RECEIVED-FPSC  
03 OCT 13 PM 4:39  
COMMISSION  
CLERK

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 Eighth Set of Interrogatories and Sixth 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 (KA)

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

AUS \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL \_\_\_\_\_  
OPC \_\_\_\_\_  
MMS \_\_\_\_\_  
SEC 1 \_\_\_\_\_  
OTH \_\_\_\_\_

DOCUMENT NUMBER-DATE

09992 OCT 13 03

FPSC-COMMISSION CLERK

**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 13th day of October, 2003 to the following:

Beth Keating, Staff Counsel  
Adam Teitzman, Staff Counsel  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6212  
Fax. No. (850) 413-6250  
[bkeating@psc.state.fl.us](mailto:bkeating@psc.state.fl.us)  
[ateitzma@psc.state.fl.us](mailto:ateitzma@psc.state.fl.us)

FPSC Staff By E-Mail Only:  
[amaurey@psc.state.fl.us](mailto:amaurey@psc.state.fl.us)  
[bgardner@psc.state.fl.us](mailto:bgardner@psc.state.fl.us)  
[bcasey@psc.state.fl.us](mailto:bcasey@psc.state.fl.us)  
[cbulecza@psc.state.fl.us](mailto:cbulecza@psc.state.fl.us)  
[david.dowds@psc.state.fl.us](mailto:david.dowds@psc.state.fl.us)  
[irojas@psc.state.fl.us](mailto:irojas@psc.state.fl.us)  
[jschindl@psc.state.fl.us](mailto:jschindl@psc.state.fl.us)  
[jebrown@psc.state.fl.us](mailto:jebrown@psc.state.fl.us)  
[lking@psc.state.fl.us](mailto:lking@psc.state.fl.us)  
[mbrinkle@psc.state.fl.us](mailto:mbrinkle@psc.state.fl.us)  
[plee@psc.state.fl.us](mailto:plee@psc.state.fl.us)  
[pvickery@psc.state.fl.us](mailto:pvickery@psc.state.fl.us)  
[plester@psc.state.fl.us](mailto:plester@psc.state.fl.us)  
[sasimmon@psc.state.fl.us](mailto:sasimmon@psc.state.fl.us)  
[sbbrown@psc.state.fl.us](mailto:sbbrown@psc.state.fl.us)  
[scater@psc.state.fl.us](mailto:scater@psc.state.fl.us)  
[tbrown@psc.state.fl.us](mailto:tbrown@psc.state.fl.us)  
[vmckay@psc.state.fl.us](mailto:vmckay@psc.state.fl.us)  
[zring@psc.state.fl.us](mailto:zring@psc.state.fl.us)

Joseph A. McGlothlin  
Vicki Gordon Kaufman (+)  
Timothy Perry  
McWhirter, Reeves, McGlothlin,  
Davidson, Decker, Kaufman, Arnold,  
& Steen, P.A.  
117 South Gadsden Street  
Tallahassee, FL 32301  
Tel. No. (850) 222-2525  
Fax. No. (850) 222-5606  
Attys. for FCCA  
Attys. for Network Telephone Corp.  
Attys. for BlueStar  
Attys. For Covad (+)  
[jmclglothlin@mac-law.com](mailto:jmclglothlin@mac-law.com)  
[vkaufman@mac-law.com](mailto:vkaufman@mac-law.com)  
[tperry@mac-law.com](mailto:tperry@mac-law.com)

Richard A. Chapkis (+)  
Terry Scobie  
Verizon Florida, Inc.  
One Tampa City Center  
201 North Franklin Street (33602)  
Post Office Box 110, FLTC0007  
Tampa, Florida 33601-0110  
Tel. No. (813) 483-2606  
Fax. No. (813) 204-8870  
[Richard.chapkis@verizon.com](mailto:Richard.chapkis@verizon.com)  
[terry.scobie@verizon.com](mailto:terry.scobie@verizon.com)

Paul Turner  
Supra Telecommunications & Info.  
Systems, Inc.  
2620 S.W. 27th Avenue  
Miami, FL 33133  
Tel. No. (305) 476-4247  
Fax. No. (305) 476-4282  
[pturner@stis.com](mailto:pturner@stis.com)

Susan S. Masterton (+)  
Sprint Comm. Co. LLP  
1313 Blair Stone Road (32301)  
P.O. Box 2214  
MC: FLTLHO0107  
Tallahassee, FL 32316-2214  
Tel. No. (850) 847-0244  
Fax. No. (850) 878-0777  
[Susan.masterton@mail.sprint.com](mailto:Susan.masterton@mail.sprint.com)

Sprint-Florida, Incorporated  
Mr. F. B. (Ben) Poag  
P.O. Box 2214 (MC FLTLHO0107)  
Tallahassee, FL 32316-2214  
Tel. No. (850) 599-1027  
Fax. No. (407) 814-5700  
[Ben.Poag@mail.sprint.com](mailto:Ben.Poag@mail.sprint.com)

William H. Weber, Senior Counsel  
Gene Watkins  
Covad Communications  
1230 Peachtree Street, N.E.  
19th Floor  
Atlanta, Georgia 30309  
Tel. No. (404) 942-3494  
Fax. No. (404) 942-3495  
[wweber@covad.com](mailto:wweber@covad.com)  
[gwatkins@covad.com](mailto:gwatkins@covad.com)

Rodney L. Joyce  
Shook, Hardy & Bacon, L.L.P.  
600 14th Street, N.W.  
Suite 800  
Washington, D.C. 20005-2004  
Tel. No. (202) 639-5602  
Fax. No. (202) 783-4211  
Counsel for Network Access Solutions  
[rjoyce@shb.com](mailto:rjoyce@shb.com)

Verizon Florida, Inc.  
Ms. Michelle A. Robinson  
%Mr. David Christian  
106 East College Avenue  
Suite 810  
Tallahassee, FL 32301-7704  
Tel. No. (813) 483-2526  
Fax. No. (813) 223-4888  
[Michelle.Robinson@verizon.com](mailto:Michelle.Robinson@verizon.com)  
[David.Christian@verizon.com](mailto:David.Christian@verizon.com)

Ms. Lisa A. Riley  
Virginia C. Tate  
1200 Peachtree Street, N.E.  
Suite 8066  
Atlanta, GA 30309-3523  
Tel. No. (404) 810-7812  
Fax. No. (404) 877-7646  
[lriley@att.com](mailto:lriley@att.com)  
[vtate@att.com](mailto:vtate@att.com)

Florida Digital Network, Inc.  
Matthew Feil, Esq.  
390 North Orange Avenue  
Suite 2000  
Orlando, FL 32801  
Tel. No. (407) 835-0460  
Fax. No. (407) 835-0309  
[mfeil@floridadigital.net](mailto:mfeil@floridadigital.net)

Catherine K. Ronis, Esq.  
Daniel McCuaig, Esq. (+)  
Jonathan J. Frankel, Esq.  
Wilmer, Cutler & Pickering  
2445 M Street, N.W.  
Washington, DC 20037-1420  
Tel. No. (202) 663-6000  
Fax. No. (202) 663-6363  
[catherine.ronis@wilmer.com](mailto:catherine.ronis@wilmer.com)  
[daniel.mccuaig@wilmer.com](mailto:daniel.mccuaig@wilmer.com)

Jonathan Audu  
c/o Ann Shelfer  
Supra Telecommunications and  
Information Systems, Inc.  
1311 Executive Center Drive  
Koger Center - Ellis Building  
Suite 200  
Tallahassee, FL 32301-5027  
Tel. No. (850) 402-0510  
Fax. No. (850) 402-0522  
[ashelfer@stis.com](mailto:ashelfer@stis.com)  
[jonathan.audu@stis.com](mailto:jonathan.audu@stis.com)

Mickey Henry  
AT&T  
1200 Peachtree Street, N.E.  
Suite 8100  
Atlanta, Georgia 30309-3523  
Tel. No. (404) 810-2078  
[michaelhenry@att.com](mailto:michaelhenry@att.com)

Mellony Michaux (by e-mail only)  
AT&T  
[mmichaux@att.com](mailto:mmichaux@att.com)

Roger Fredrickson (by e-mail only)  
AT&T  
[rfredrickson@att.com](mailto:rfredrickson@att.com)

Tracy W. Hatch, Esq. (+) (\*)  
AT&T Communications of the  
Southern States, LLC  
101 North Monroe Street, Ste. 700  
Tallahassee, FL 32301  
Tel. No. (850) 425-6360  
Fax No. (850) 425-6361  
[thatch@att.com](mailto:thatch@att.com)

Floyd Self  
Messer, Caparello & Self  
Post Office Drawer 1876  
215 South Monroe Street, Suite 701  
Tallahassee, FL 32302-1876  
Tel. No. (850) 222-0720  
Fax. No. (850) 224-4359  
Co-counsel for AT&T  
[fself@lawfla.com](mailto:fself@lawfla.com)

Scott A. Kassman  
FDN Communications  
390 North Orange Avenue  
Suite 2000  
Orlando, FL 32801  
Tel No. (407) 447-6636  
Fax No. (407) 447-4839  
[www.fdn.com](http://www.fdn.com)

  
\_\_\_\_\_  
J. Phillip Carver (11/1)

(+) 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
<hr/>		Filed: October 13, 2003

**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
OBJECTIONS TO AT&T'S EIGHTH SET OF INTERROGATORIES  
AND SIXTH 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 Eighth Set of Interrogatories and Sixth Request for Production of Documents, dated October 3, 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.

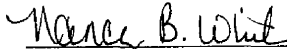
10 BellSouth is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, BellSouth creates countless documents that are not subject to Commission or FCC retention of records requirements. These documents are kept in numerous 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**

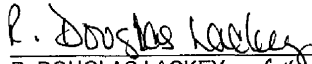
11. BellSouth objects to AT&T's Interrogatory No. 53 and Request to Produce No. 87, which call for the disclosure of information/documents that are protected by the work product privilege, the attorney client privilege, and the joint defense doctrine.

Respectfully submitted this 13<sup>th</sup> day of October, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.



\_\_\_\_\_  
NANCY B. WHITE (CA)  
JAMES MEZA III  
c/o Nancy H. Sims  
150 So. Monroe Street, Suite 400  
Tallahassee, FL 32301  
(305) 347-5558



\_\_\_\_\_  
R. DOUGLAS LACKEY (CA)  
J PHILLIP CARVER  
Suite 4300  
675 W. Peachtree St., NE  
Atlanta, GA 30375  
(404) 335-0710

507873