

ORIGINAL



Tracy Hatch
Senior Attorney
Law and Government Affairs
Southern Region

Suite 700
101 N. Monroe Street
Tallahassee, FL 32301
850-425-6360

November 21, 2003

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

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COMMISSION
CLERK

Re: Docket No. 030852-TP

Dear Ms. Bayó:

Enclosed for filing are an original and fifteen copies of AT&T Communications of the Southern States, LLC's General Objections to Staff's Information Requests to AT&T in the above-referenced docket.

Please acknowledge receipt of this letter by stamping the extra copy of this letter "filed," and return to me at the time of filing.

Thank you for your assistance.

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Th
FPSC-BUREAU OF RECORDS

Sincerely yours,

Tracy Hatch/las
Tracy W. Hatch

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TWH/las
Enclosure
cc: Parties of Record

DOCUMENT NUMBER-DATE
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FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE
DOCKET NO. 030852-TP**

I HEREBY CERTIFY that a copy of the foregoing has been furnished via electronic mail or as indicated this 21st day of November 2003, to the following parties of record:

<p>Adam Teitzman Office of the General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 Email: ateitzma@psc.state.fl.us</p>	<p>BellSouth Telecommunications, Inc. Nancy B. White c/o Ms. Nancy H. Sims 150 South Monroe Street, Suite 400 Tallahassee, FL 32301-1556 Phone: (850) 224-7798 Fax: 222-8640 Email: nancy.sims@bellsouth.com</p>
<p>Florida Cable Telecom. Assoc., Inc. Michael A. Gross 246 E. 6th Avenue, Suite 100 Tallahassee, FL 32303 Phone: 850-681-1990 Fax: 681-9676 Email: mgross@fcta.com</p>	<p>MCI WorldCom Communications, Inc. Ms. Donna C. McNulty 1203 Governors Square Blvd., Suite 201 Tallahassee, FL 32301-2960 Phone: (850) 219-1008 Fax: 219-1018 Email: donna.mcnulty@wcom.com</p>
<p>Sprint – Florida Susan S. Masterton 1313 Blairstone Road MC: FLTLHO0107 Tallahassee, FL 32301 Phone: (850) 847-0244 Fax: 878-0777 Email: susan.masterton@mail.sprint.com</p>	<p>KMC Telecom III, LLC Marva Brown Johnson, Esq. 1755 North Brown Road Lawrenceville, GA 30043-8119 Phone: (678) 985-6261 Fax: (678) 985-6213 Email: marva.johnson@kmctelecom.com</p>
<p>Covad Communications Company Charles E. Watkins 1230 Peachtree Street, NE 19th Floor Atlanta, GA 30309 Phone: (404) 942-3492 Email: gwatkins@covad.com</p>	<p>ITC^DeltaCom Nanette Edwards 4092 South Memorial Parkway Huntsville, AL 35802 Phone: (256) 382-3856</p>
<p>McWhirter Reeves McGlothlin Davidson Kaufman & Arnold, PA Vicki Gordon Kaufman 117 South Gadsden Street Tallahassee, FL 32301 Phone: (850) 222-2525 Email: vkaufman@mac-law.com</p>	<p>Verizon Florida Inc. Mr. Richard Chapkis 201 N. Franklin Street, MCFLTC0007 Tampa, FL 33601 Phone: (813) 483-2606 Fax: (813) 204-8870 Email: richard.chapkis@verizon.com</p>
<p>Allegiance Telecom of Florida, Inc. Jeffrey J. Binder 1919 M Street, N.W. Washington, DC 20037 Phone: (202) 464-1792 Fax: (202) 464-0762 Email: Jeff.binder@algx.com</p>	<p>Allegiance Telecom, Inc. Terry Larkin 700 East Betterfield Road Washington, DC 60148 Phone: 630-522-6453 Email: terry.larkin@algx.com</p>
<p>FDN Communications</p>	<p>Florida Competitive Carriers Assoc. C/O McWhirter Law Firm</p>

<p>Matthew Feil/Scott Kassman 390 North Orange Avenue, Suite 2000 Orlando, FL 32801-1640 Phone: (407) 835-0460 Fax: (407) 835-0309 Email: mfeil@mail.fdn.com/skassman@mail.fdn.com</p>	<p>Joseph McGlothlin/Vicki Kaufman 117 S. Gadsden Street Tallahassee, FL 32301 Phone: (850) 222-2525 Fax: (850) 222-5606 email: jmcglothlin@mac-law.com/vkaufman@mac-law.com</p>
<p>MCI WorldCom Communications, Inc.(GA) De O'Roark, Esq. Six Concourse Parkway, Suite 600 Atlanta, GA 30328 Email: de.oroark@wcom.com</p>	<p>Messer Law Firm Floyd Self/Norman Horton P. O. Box 1876 Tallahassee, FL 32302-1876 Phone: (850) 222-0720 Fax: (850) 224-4359</p>
<p>Moyle, Flanigan, Katz, Raymond & Sheehan, P.A. Jon C. Moyle, Jr. The Perkins House 118 North Gadsden Street Tallahassee, FL 32301 Phone: (850) 681-3828 Fax: 681-8788 Email: jmoylejr@moylelaw.com</p>	<p>NewSouth Communications Corp. Jake E. Jennings Two North Main Center Greenville, SC 29601-2719 Phone: (864) 672-5877 Fax: (864) 672-5313 Email: jejennings@newsouth.com</p>
<p>Xspedius Communications Ms. Rabinai E. Carson 5555 Winghaven Blvd., Suite 300 O'Fallon, MO 63366-3868 Phone: (301) 361-4220 Fax: (301) 361-4277 Email: rabinai.carson@xspedius.com</p>	<p>BellSouth Telecommunications, Inc. Douglas Lackey 675 W. Peachtree Street, Suite 4300 Atlanta, GA 30375</p>
<p>Supra Telecommunications and Info. Systems Jorge Cruz-Bustillo 2620 S.W. 27th Avenue Miami, FL 33133 Phone: (305) 476-4252 Fax: (305) 443-1078 Email: Jorge.cruz-bustillo@stis.com</p>	<p>Supra Telecommunications and Info. Systems Jonathan Audu 1311 Executive Center Drive, Suite 220 Tallahassee, FL 32301-5027 Phone: (850) 402-0510 Fax: (850) 402-0522 Jonathan.audu@stis.com</p>
<p>Nuvox Communications, Inc. Bo Russell 301 North Main Street Greenville, SC 29601</p>	

Tracy Hatch / Esq

Tracy W. Hatch, Esq.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Implementation of Requirements)	
Arising From Federal Communications)	Docket No.: 030852-TP
Commission Triennial UNE Review:)	
Location Specific-Review for DS1, DS3,)	Filed: November 21, 2003
And Dark Fiber Loops and Route-)	
Specific Review for DS1, DS3, and Dark)	
Fiber Transport)	
_____)	

AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC'S
OBJECTIONS TO FLORIDA PUBLIC SERVICE COMMISSION STAFF
INFORMATION REQUESTS

AT&T Communications of the Southern States, LLC (hereinafter "AT&T"), pursuant to the *Order Establishing Procedure*, Order No. PSC-03-1054-PCO-TP, issued September 22, 2003, and *Second Order on Procedure*, Order No. PSC-03-1265-PCO-TP, issued November 7, 2003 (hereinafter collectively "*Procedural Orders*") by the Florida Public Service Commission (hereinafter "Commission"), Rule 28-106.206 of the Florida Administrative Code, and Rules 1.280 and 1.340 of the Florida Rules of Civil Procedure, hereby submits the following objections to Florida Public Service Commission Staff's (hereinafter "FPSC Staff") Information Requests to AT&T Communications of the Southern States, LLC.

OVERVIEW

AT&T files these objections for purposes of complying with the seven (7) day requirement set forth in the *Procedural Orders*. These objections are preliminary in nature. Should additional grounds for objection be discovered as AT&T prepares its responses to any discovery, or at any time prior to hearing, AT&T reserves the right to supplement, revise, and/or modify these objections.

GENERAL OBJECTIONS

AT&T makes the following general objections to the Information Requests which will be incorporated by reference into AT&T's specific responses when AT&T responds to the Information Requests.

A. AT&T objects to the FPSC Staff's Information Requests to AT&T to the extent that the Information Requests are overly broad, unduly burdensome, irrelevant, oppressive and not reasonably calculated to lead to the discovery of admissible evidence pursuant to the *Procedural Orders*, Rule 28-106.206 of the Florida Administrative Code, and Rules 1.280 and 1.340 of the Florida Rules of Civil Procedure.

B. AT&T objects to the FPSC Staff's Information Requests to AT&T to the extent that the Information Requests purport to seek discovery of information protected by attorney/client privilege, the accountant/client privilege, the work product doctrine or any other applicable privilege.

C. AT&T objects to the FPSC Staff's Information Requests to AT&T to the extent that the Information Requests purport to seek discovery of information and/or materials containing the mental impressions, conclusions, opinions or legal theories of any attorney or other representative of AT&T concerning the subject of the proceeding and prepared and developed in anticipation of litigation pursuant to Rule 1.280(b)(3) of the Florida Rules of Civil Procedure.

D. AT&T objects to the FPSC Staff's Information Requests to AT&T to the extent that the Information Requests purport to impose discovery obligations on AT&T inconsistent with, or beyond the scope of, what is permitted under the *Procedural Orders* and applicable Florida law.

E. AT&T objects to the FPSC Staff's Information Requests to AT&T to the extent that the Information Requests purport to seek discovery of matters other than those subject to the jurisdiction of the Commission pursuant to the FCC's Triennial Review Order, Florida Administrative Code and Florida Statutes.

F. AT&T objects to the FPSC Staff's Information Requests to AT&T to the extent that the Information Requests purport to seek disclosure of information that is proprietary confidential information or a "trade secret" without the issuance of an appropriate Protective Order or Confidential Classification as outlined by the *Procedural Orders*, §364.183 of the Florida Statutes, §90-506 of the Florida Statutes, and Rule 25-22.006.

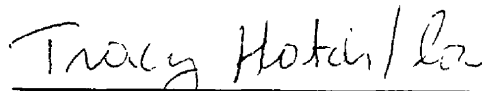
G. AT&T objects to all Information Requests which require the disclosure of information which already is in the public domain or otherwise

on record with the Commission or the FCC.

H. AT&T objects to the FPSC Staff's Information Requests to AT&T to the extent that the Information Requests seek information and discovery of facts known and opinions held by experts acquired and/or developed in anticipation of litigation or for hearing and outside the scope of discoverable information pursuant to Rule 1.280(4) of the Florida Rules of Civil Procedure.

I. Pursuant to the *Procedural Orders*, the Triennial Review Order, Rule 28-106.206 of the Florida Administrative Code, and Rules 1.280 and 1.340 of the Florida Rules of Civil Procedure, to the extent that FPSC Staff's Information Requests request specific financial, business or proprietary information regarding AT&T's economic business model, AT&T objects to providing or producing any such information on the grounds that those Information Requests presume that the market entry analysis is contingent upon AT&T's economic business model instead of the hypothetical business model contemplated by the Triennial Review Order.

Respectfully submitted, this the 21th day of November, 2003.



TRACY W. HATCH, ESQ.

101 N. Monroe Street

Suite 700

Tallahassee, FL 32302-1876

(850) 425-6360

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