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January 6, 2004

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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 General Objections to Verizon's First Request for Production of Documents (No. 1), 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)

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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 Federal Express (\*), First Class U.S. Mail and Electronic Mail this 6th day of January, 2004 to the following:

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J. Phillip Carver (DA)

**(+) 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	)	
<hr/>		Filed: January 6, 2004

**BELLSOUTH TELECOMMUNICATIONS, INC.'S GENERAL OBJECTIONS  
TO VERIZON'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (No. 1)**

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 General Objections to Verizon's First Request for Production of Documents (No. 1), dated December 23, 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 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 the requests to the extent they seek 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 requests are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. BellSouth objects to the requests to the extent they are intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission. BellSouth objects to such requests as being irrelevant, overly broad, unduly burdensome, and oppressive.

3. BellSouth objects to each and every request and instruction to the extent that such requests 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. BellSouth objects to each and every request insofar as the requests are 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 answers provided by BellSouth in response to the requests will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth objects to each and every request insofar as 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 and every request to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to §90.506, *Florida Statutes*. BellSouth also objects to each and every request that would require the disclosure of customer specific information, the disclosure of which is

prohibited by §364.24, *Florida Statutes*. To the extent that the ALEC Coalition's requests ask for proprietary information that is not subject to the "trade secrets" privilege or to §364.24, BellSouth will make such information available to the ALEC Coalition at a mutually agreeable time and place pursuant to a Motion for Protective Order, or subject to a Request for Confidential Classification.

8. BellSouth objects to the requests, instructions and definitions, insofar as they seek to impose obligations on BellSouth that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

9. BellSouth objects to each and every request, insofar as any of them is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

10. BellSouth objects to providing again any documents that it has already produced to Staff in this proceeding.

11. 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. Therefore, it is possible that not every document has been identified in response to these requests. BellSouth will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the requests purport to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

Respectfully submitted this 6th day of January, 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.

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