

11/12/95

LAW OFFICES  
MESSER, CAPARELLO, MADSEN, GOLDMAN & METZ  
A PROFESSIONAL ASSOCIATION

SUITE 701  
215 SOUTH MONROE STREET  
POST OFFICE BOX 1876  
TALLAHASSEE, FLORIDA 32302-1876  
TELEPHONE: (904) 222-0720  
TELECOPIERS: (904) 224-4359  
(904) 425-1942

ORIGINAL  
FILE COPY

December 22, 1995

Ms. Blanca Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
Room 110, Easley Building  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

**BY HAND DELIVERY**

Re: Docket No. 950985-TP

Dear Ms. Bayo:

Enclosed for filing are an original and 15 copies of McCaw Communications of Florida, Inc.'s Objections to BellSouth Telecommunications, Inc.'s First Set of Interrogatories in the above-referenced docket.

Please indicate receipt of this document by stamping the enclosed extra copy of this letter.

Your attention to this filing is appreciated.

Sincerely,

Norman H. Horton, Jr.  
Norman H. Horton, Jr. *by ab*

NHH/amb

Enclosures

cc: William H. Higgins, Esq.  
Parties of Record

RECEIVED & FILED

*[Signature]*  
FPSC SUB-20

DOCUMENT NUMBER-DATE

12948 DEC 22 95

FPSC-RECORDS/REPORTING

ACK ✓  
AMB  
APP  
CAP  
CHS  
DOR  
EAS  
GAB  
HIG  
JUN  
KAY  
LAW  
MAD  
MET  
NHH  
OCH  
PAC  
RAB  
SAB  
TAM  
TAY  
VAB  
WAB  
YAB

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of petition(s) )  
to establish nondiscriminatory )  
rates, terms, and conditions for )  
interconnection involving local ) Docket No. 950985-TP  
exchange companies and alternative ) Filed: December 22, 1995  
local exchange companies pursuant )  
to Section 364.162, Florida )  
Statutes )  
\_\_\_\_\_ )

**MCCAW COMMUNICATIONS OF FLORIDA, INC.'S  
OBJECTIONS TO BELL SOUTH TELECOMMUNICATIONS, INC.'S  
FIRST SET OF INTERROGATORIES**

McCaw Communications of Florida, Inc. on behalf of itself and its Florida regional affiliates ("McCaw"), 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 submits the following Objections to the First Set of Interrogatories from BellSouth Telecommunications, Inc. ("BellSouth").

The Objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the requirement set forth in Order No. PSC-95-1421-PCO-TP issued by the Florida Public Service Commission ("FPSC") in the above-referenced docket on November 22, 1995.

**GENERAL OBJECTIONS**

McCaw makes the following General Objections to BellSouth's First Set of Interrogatories which are also incorporated by reference into specific responses.

DOCUMENT NUMBER-DATE

12948 DEC 22 1995

FPSC-RECORDS/REPORTING

796

1. McCaw objects to the interrogatories to the extent that such interrogatories seek to impose an obligation on McCaw to respond on behalf of affiliates or other persons that are not parties to this case on the grounds that such requests are overly broad, and not permitted.

2. McCaw objects to any interrogatory that is intended to apply to matters other than operations in Florida on the basis that such interrogatory is irrelevant, overly broad, unduly burdensome, and oppressive.

3. McCaw objects to each 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.

4. McCaw objects to each 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 action.

5. McCaw objects to each discovery request insofar as each seeks to impose obligations which exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

6. McCaw objects to each and every interrogatory, insofar as

it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

SPECIFIC OBJECTIONS

1. McCaw objects to this interrogatory on the basis that the request relates to operations in jurisdictions other than Florida and are irrelevant, overly broad and unduly burdensome. Further the interrogatory does not relate to any issue in this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding the foregoing objections and without waiving any objection, McCaw would answer this interrogatory by stating that McCaw Communications of Florida does not conduct operations in states other than Florida.

2. McCaw objects to this interrogatory on the basis that the request relates to operations in jurisdictions other than Florida and are irrelevant, overly broad and unduly burdensome. Further the interrogatory does not relate to any issue in this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

3. McCaw objects to this interrogatory on the basis that the request relates to operations in jurisdictions other than Florida and are irrelevant, overly broad and unduly burdensome. Further the interrogatory does not relate to any issue in this docket and

is not reasonably calculated to lead to the discovery of admissible evidence.

4. McCaw objects to this interrogatory on the basis that the request is vague, overly broad, unduly burdensome, not relevant to the subject matter of this case and not reasonably calculated to lead to discovery of admissible evidence. The interrogatory uses the term "interconnection" but does not define that term and as used the term covers a multitude of arrangements.

5. McCaw objects to this interrogatory on the basis that it is unduly burdensome, expensive, not related to any issue in this case and not calculated to lead to the discovery of admissible evidence. A universal service mechanism has been established by this Commission in Docket No. 950696-TP.

6. McCaw objects to this interrogatory on the basis that it is unduly burdensome, expensive, not related to any issue in this case and not calculated to lead to the discovery of admissible evidence. Number portability has been decided by this Commission in Docket No. 950737-TP.

7. McCaw objects to this interrogatory on the basis that it is unduly burdensome, expensive, not related to any issue in this case and not calculated to lead to the discovery of admissible evidence. Further, the information sought would be in the nature

of public information and available to BellSouth.

8. McCaw objects to this interrogatory on the basis that it is unduly burdensome, expensive, not related to any issue in this case and not calculated to lead to the discovery of admissible evidence. Further, the information sought would be in the nature of public information and available to BellSouth; McCaw does not have such information in its possession.

9. McCaw objects to this interrogatory on the basis that it is unduly burdensome, expensive, not related to any issue in this case and not calculated to lead to the discovery of admissible evidence. Further, the information sought would be in the nature of public information and available to BellSouth; McCaw does not have such information in its possession.

Respectfully submitted this 22nd day of December, 1995.

Respectfully submitted,

MESSER, CAPARELLO, MADSEN,  
GOLDMAN & METZ, P.A.  
Post Office Box 1876  
Tallahassee, FL 32302-1876  
(904) 222-0720

*Norman H. Horton, Jr. by ab*  
FLOYD R. SELF, ESQ.  
NORMAN H. HORTON, JR., ESQ.

Attorneys for McCaw Communications  
of Florida, Inc. and its Florida  
regional affiliates

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of McCaw Communications of Florida, Inc.'s Objections to BellSouth Telecommunications, Inc.'s First Set of Interrogatories in Docket No. 950985-TP has been furnished by Hand Delivery (\*) and/or U. S. Mail on this 22nd day of December, 1995 to the following parties of record:

Robert Elias, Esq.\*  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Jack Shreve  
Office of the Public Counsel  
111 W. Madison St., Room 812  
Tallahassee, FL 32399-1400

Nancy H. Sims  
BellSouth Telecommunications, Inc.  
150 S. Monroe St., Suite 400  
Tallahassee, FL 32301

Beverly Y. Menard  
c/o Richard Fletcher  
GTE Florida, Inc. Fo  
106 E. College Avenue, Suite 1440  
Tallahassee, FL 32301-7704

F. Ben Poag  
Sprint/United Telephone  
Company of Florida  
315 S. Calhoun St. Suite 740  
Tallahassee, FL 32301

Laurie Maffett  
Frontier Communications of the South,  
Inc.  
4th Floor  
180 S. Clinton Ave.  
Rochester, NY 14646-0400

Mr. Richard Brashear  
ALLTEL Florida, Inc.  
P.O. Box 550  
Live Oak, FL 32060-0550

David B. Erwin  
Young Van Assenderp et al.  
225 S. Adams Street, Suite 200  
Tallahassee, FL 32301

Jodie Donovan  
Teleport Communications Group  
2 Lafayette Place  
Suite 400  
1133 Twenty-First St., NW  
Washington, DC 20036

Kenneth A. Hoffman  
William Be. Willingham  
Rutledge, Ecenia, Underwood,  
and Hoffman  
215 S. Monroe St., Suite 420  
Tallahassee, FL 32301

A. D. Lanier  
Gulf Telephone  
P.O. Box 1120  
Perry, FL 32347

Dan Gregory  
Quincy Telephone Company  
P.O. Box 189  
Quincy, FL 32363-0189

John McGlew  
Northeast Florida Telephone Co.  
P.O. Box 485  
Macclenny, FL 32063-0485

Ferrin Seay  
Floral Telephone Company  
P.O. Box 186  
Floral, AL 36442

Robert M. Post  
Indiantown Telephone System, Inc.  
P.O. Box 277  
Indiantown, FL 34956-0277

Lynn B. Hall  
Vista-United Telecommunications  
P.O. Box 10180  
Lake Buena Vista, FL 32830-0180

John Vaughan  
St. Joseph Telephone & Telegraph Co.  
P.O. Box 220  
Port St. Joe, FL 32456

Michael W. Tye, Esq.  
Senior Attorney  
AT&T  
101 N. Monroe St., Ste. 700  
Tallahassee, FL 32301

Robin Dunson, Esq.  
AT&T  
Promenade I, Room 4038  
1200 Peachtree St., NE  
Atlanta, GA 30309

Anthony P. Gillman  
Kimberly Caswell  
GTE Florida, Inc.  
c/o Richard M. Fletcher  
106 E. College Ave., Suite 1440  
Tallahassee, FL 32301

Richard D. Melson  
Hopping Green Sams & Smith  
123 S. Calhoun St.  
Tallahassee, FL 32301

Michael J. Henry  
MCI Telecommunications Corp.  
780 Johnson Ferry Road., Suite 700  
Atlanta, GA 30342

Laura L. Wilson, Esq.  
Florida Cable Telecommunications  
Association  
310 N. Monroe Street  
Tallahassee, FL 32301

Sue E. Weiske  
Senior Counsel  
Time Warner Communications  
160 Inverness Drive West  
Englewood, CO 80112

Richard Rindler  
James C. Falvey  
Swidler & Berlin, Chartered  
Suite 300  
3000 K Street, NW  
Washington, DC 20007

Timothy Devine  
MFS Communications Co., Inc.  
Six Concourse Parkway, Suite 2100  
Atlanta, GA 30328

Patrick K. Wiggins  
Wiggins & Villacorta  
P.O. Drawer 1657  
Tallahassee, FL 32302

Peter M. Dunbar, Esq.  
Charles Murphy, Esq.  
Pennington & Haben, P.A.  
P.O. Box 10095  
Tallahassee, FL 32302

Ms. Jill Butler  
Florida Regulatory Director  
Time Warner Communications  
2773 Red Maple Ridge  
Tallahassee, FL 32301

C. Everett Boyd, Jr.  
Ervin, Varn, Jacobs,  
Odom & Ervin  
Post Office Drawer 1170  
Tallahassee, FL 32302

Benjamin Fincher, Esq.  
Sprint Communications Co.  
Limited Partnership  
3065 Cumberland Circle  
Atlanta, GA 30339

By: Norman H. Horton, Jr. by ab  
Norman H. Horton, Jr.