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December 26, 1995

ORIGINAL  
FILE COPY

VIA AIRBORNE EXPRESS

Mrs. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Docket No. ~~950984~~-TP  
Docket No. 950984A-TP  
Docket No. 950984B-TP

Dear Mrs. Bayo:

Enclosed for filing in the above referenced docket(s) are an original and fifteen (15) copies of AT&T's Objections to BellSouth Telecommunications, Inc.'s First Set of Interrogatories; and an original and fifteen (15) copies of AT&T's Objections to BellSouth's Inc.'s Revised First Request for Production of Documents.

Also enclosed is an extra copy of each. Please date stamp the extra copies and return in the enclosed self-addressed envelope.

Yours truly,

*Robin D. Dunson*  
Robin D. Dunson

Enclosures

cc: J. P. Spooner, Jr.  
Parties of Record

- ACK
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAE \_\_\_\_\_
- CMU *Chase*
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 1
- LIN 5
- OFC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1
- VAS \_\_\_\_\_
- DTH \_\_\_\_\_

RECEIVED & FILED  
*[Signature]*  
FPSC-BUREAU OF RECORDS

*Interrog.* P.O.D.  
DOCUMENT NUMBER-DATE DOCUMENT NUMBER-DATE  
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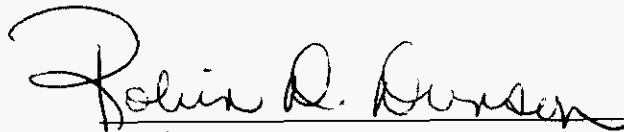
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of petitions(s) ) DOCKET NO. 950984-TP  
to establish nondiscriminatory ) DOCKET NO. 950984A-TP  
rates, terms, and conditions for ) DOCKET NO. 950984B-TP  
resale involving local exchange )  
companies and alternative local )  
exchange companies pursuant to )  
Section 364.161, Florida Statutes ) FILED: DECEMBER 27, 1995  
)

NOTICE OF SERVICE

AT&T Communications of the Southern States, Inc. ("AT&T"),  
by and through its undersigned attorney, hereby serves this  
notice that AT&T served its Objections to BellSouth  
Telecommunications, Inc.'s First Set of Interrogatories on  
December 26, 1995.

Respectfully submitted,



Robin D. Dunson  
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ATTORNEY FOR AT&T  
COMMUNICATIONS OF THE  
SOUTHERN STATES, INC.

DOCUMENT NUMBER-DATE

13052 DEC 27 95

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of petition(s) )  
to establish nondiscriminatory ) Docket No. 950984-TP  
rates, terms, and conditions for ) Docket No. 950984A-TP (MFS)  
resale involving local exchange ) Docket No. 950984B-TP (MCImetro)  
companies and alternative local )  
exchange companies pursuant to ) Served: December 26, 1995  
Section 364.161, Florida Statutes )  
\_\_\_\_\_ )

AT&T'S OBJECTIONS TO BELLSOUTH TELECOMMUNICATIONS, INC.'S  
FIRST SET OF INTERROGATORIES

AT&T Communications of the Southern States, Inc.  
(hereinafter "AT&T"), 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 BELLSOUTH Telecommunications, Inc.'s (hereinafter "BELLSOUTH")  
First Set of Interrogatories to AT&T Communications of the Southern  
States, Inc.

The Objections stated herein are preliminary in nature and are  
made at this time for the purpose of complying with the ten-day  
requirement set forth in Order No. PSC-95-1083-PCO-TP issued by the  
Florida Public Service Commission (hereinafter the "Commission") in  
the above-referenced docket on August 30, 1995. Should additional  
grounds for objection be discovered as AT&T prepares its Answers to  
the above-referenced set of interrogatories, AT&T reserves the  
right to supplement, revise, or modify its objections at the time  
that it serves its Answers on BELLSOUTH. Moreover, should AT&T  
determine that a Protective Order is necessary with respect to any  
of the material requested by BELLSOUTH, AT&T reserves the right to

file a motion with the Commission seeking such an order at the time that it serves its Answers on BELLSOUTH.

### General Objections

AT&T makes the following General Objections to BELLSOUTH's First Set of Interrogatories which will be incorporated by reference into AT&T's specific responses when its Answers are served on BELLSOUTH.

1. AT&T objects to the following provisions of the "Definitions" section of BELLSOUTH's First Set of Interrogatories:

Paragraph 1: AT&T objects to the definitions of "you" and "your" to the extent that such definitions seek to impose an obligation on AT&T Communications of the Southern States, Inc. to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such definition is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. Without waiver of its general objection, and subject to other general and specific objections, Answers will be provided on behalf of AT&T Communications of the Southern States, Inc. which is the interexchange carrier (hereinafter "IXC") certificated to provide regulated telecommunications services in Florida and which is a party to this docket. All references to "AT&T" in responding to BELLSOUTH's interrogatories should be taken to mean AT&T Communications of the Southern States, Inc.

2. Unless otherwise indicated, AT&T has interpreted BELLSOUTH's interrogatories to apply to AT&T's regulated intrastate operations in Florida and will limit its Answers accordingly. To the extent that any interrogatory is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission, AT&T objects to such interrogatory as irrelevant, overly broad, unduly burdensome, and oppressive.

3. AT&T objects to each and every interrogatory and instruction to the extent that such interrogatory 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. AT&T objects to each and every 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. Any Answers provided by AT&T in response to BELLSOUTH's interrogatories will be provided subject to, and without waiver of, the foregoing objection.

5. AT&T objects to each and every 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. AT&T will attempt to note each instance where this objection applies.

6. AT&T objects to BELLSOUTH's general instructions, definitions or specific discovery requests insofar as they seek to

impose obligations on AT&T which exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

7. AT&T objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

8. AT&T objects to each and every interrogatory, general instruction, or definition insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. AT&T objects to each and every interrogatory to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that BELLSOUTH's interrogatories request proprietary confidential business information which is not subject to the "trade secrets" privilege, AT&T will make such information available to counsel for BELLSOUTH pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

#### Objections to Specific Interrogatories

Subject to, and without waiver of, the foregoing general objections, AT&T enters the following specific objections with respect to BELLSOUTH's interrogatories:

**INTERROGATORY NO. 1:** Pursuant to the General Objections stated above, AT&T will limit its Answer to this interrogatory to matters that apply to the regulated intrastate operations of AT&T Communications of the Southern States, Inc., which operates in the states of Florida, Georgia, South Carolina, and North Carolina. In addition to the General Objections

stated above, AT&T specifically objects to any portion of the interrogatory which may call for information pertaining to entities other than AT&T Communications of the Southern States, Inc. on the grounds that such request is irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. Moreover, to the extent that BELLSOUTH was also a party to any of the proceedings upon which this request is based, AT&T objects to the interrogatory on the grounds that the request is unduly burdensome and oppressive, inasmuch as the requested information is already available to BELLSOUTH through its participation in the subject proceeding.

**INTERROGATORY NO. 2:** Same objection as Interrogatory No. 1.

**INTERROGATORY NO. 3:** Pursuant to the General Objections stated above, AT&T will limit its Answer to this interrogatory to matters that apply to the regulated intrastate operations of AT&T Communications of the Southern States, Inc., which operates in the states of Florida, Georgia, South Carolina, and North Carolina. In addition to the General Objections stated above, AT&T specifically objects to any portion of the interrogatory which may call for information pertaining to entities other than AT&T Communications of the Southern States, Inc., on the grounds that such request is irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. Moreover, to the extent BELLSOUTH is also a party to any agreement on which this request is based, AT&T objects to the interrogatory on the

grounds that the request is unduly burdensome and oppressive inasmuch as the requested information is already available to BELLSOUTH through its status as a party to such agreement. To the extent that AT&T's Answer to this interrogatory contains proprietary confidential business information, AT&T will allow counsel for BELLSOUTH to inspect such information only upon execution of an appropriate Protective Agreement.

**INTERROGATORY NO. 4:** Same objection as Interrogatory No. 3.

**INTERROGATORY NO. 7:** In addition to its General Objections, AT&T objects to this interrogatory on the grounds that the request is irrelevant to the present proceeding inasmuch as AT&T is not a provider of local exchange service. Moreover, AT&T submits that this request is overly broad, unduly burdensome, and oppressive in that the request constitutes nothing more than an attempt by BELLSOUTH to gain valuable competitive information designed to give BELLSOUTH an unfair advantage in its attempts to enter the interLATA telecommunications market when and if it is authorized to do so. Such information has no relevance to this case, nor does it relate to any potential issue in said case.

**INTERROGATORY NO. 8:** Same objection as Interrogatory No. 7.

**INTERROGATORY NO. 9:** Pursuant to the General Objections stated above, AT&T will limit its Answer to this interrogatory to matters that apply to the regulated intrastate operations of AT&T Communications of the Southern States, Inc., which operates in the States of Florida, Georgia, South Carolina, and North Carolina. In addition to the General Objections




stated above, AT&T specifically objects to any portion of the interrogatory which may call for information pertaining to entities other than AT&T Communications of the Southern States, Inc., on the grounds that such request is irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. To the extent that BELLSOUTH is a direct competitor of AT&T in a specific jurisdiction, AT&T objects to the disclosure of any information to BELLSOUTH regarding the costs, profitability, or configuration of its actual or potential local exchange network, on the grounds that such information is highly sensitive, confidential business information which cannot be disclosed to a direct competitor and which constitutes a "trade secret" that is privileged under Florida law.

**INTERROGATORY NO. 10:** Same objection as Interrogatory No. 9.

**INTERROGATORY NO. 11:** Same objection as Interrogatory No. 9.

SUBMITTED this 26th day of December, 1995.



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ATTORNEYS FOR AT&T  
COMMUNICATIONS OF THE SOUTHERN  
STATES, INC.

CERTIFICATE OF SERVICE

DOCKET NO. 950984-TP

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand-delivery to the following parties of record this 26<sup>th</sup> day of December, 1995:

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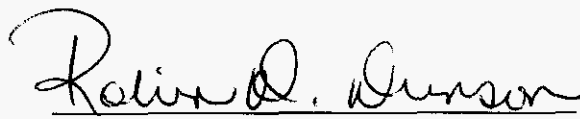
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