


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 Request for Production of
Documents on December 26, 1995.

Respectfully submitted,



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

DOCUMENT NUMBER-DATE
13053 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 REQUEST FOR PRODUCTION OF DOCUMENTS

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 1.350 and 1.280(b), Florida
Rules of Civil Procedure, hereby submits the following Objections
to BellSouth Telecommunications, Inc.'s (hereinafter "BELLSOUTH")
First Request for Production of Documents 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 Responses
to the above-referenced set of requests, AT&T reserves the right to
supplement, revise, or modify its objections at the time that it
serves its Responses 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 Responses on BELLSOUTH.

General Objections

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

1. AT&T objects to the following provisions of the "Instructions" section of BELLSOUTH's First Set of Requests for Production of Documents:

Paragraph 1: AT&T objects to this instruction on the grounds that the instruction is overly broad, unduly burdensome, oppressive, not permitted by applicable discovery rules, and would require AT&T to disclose information which is privileged.

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

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

5. AT&T objects to each and every request 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 request, 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 request 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 requests seek proprietary confidential business information which is not the subject of 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.

10. AT&T is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, AT&T creates countless documents that are not subject to Florida Public Service Commission or FCC retention of records requirements. These documents are kept in numerous locations and 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 provided in response to these discovery requests. Rather, these responses provide all of the information obtained by AT&T after a reasonable and diligent search conducted in connection with this discovery request. AT&T has complied with BELLSOUTH's request that a search be conducted of those files that are reasonably expected to contain the requested information. To the extent that the discovery request purports to require more, AT&T objects on the grounds that compliance would impose an undue burden or expense.

Objections to Specific Requests

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

Request No. 1: AT&T objects to this request on the same grounds set forth in AT&T's objections to Interrogatory Nos. 1-11 contained in AT&T's Objections to BellSouth

Telecommunications, Inc.'s First Set of Interrogatories which is being served on BELLSOUTH contemporaneously with these objections. Such objection is incorporated herein by specific reference thereto. AT&T will respond to this request to the same extent outlined in its objections to said interrogatories.

Request No. 2: Same objection as Request No. 1.

Request No. 3: In addition to the general objections stated above, AT&T objects to this request on the following grounds:

A. The request is irrelevant inasmuch as AT&T is not a petitioner in the above-referenced case. AT&T's status in this case is merely that of intervenor in support of the requests made by MFS and MCImetro, who are the petitioners. Indeed, the issues before the Commission relate to the specific requests of MFS and MCImetro and do not reference any request by AT&T, which has not even applied for ALEC certification in Florida at the present time.

B. The request is overly broad, unduly burdensome, and oppressive in that it would have the effect of penalizing AT&T for its intervention in this case by forcing it to search files and provide documents which are not relevant to the petitions before the Commission and the issues which are based upon said petitions.

C. The request calls for highly sensitive, confidential business information which is protected by the "trade secrets" privilege under Florida law. AT&T objects to

any request that would require it to release such information, even under a Protective Agreement, to an actual or potential competitor, such as BellSouth.

D. Inasmuch as AT&T has neither filed a request with the Commission to become an ALEC nor filed a petition with the Commission seeking unbundling and resale, AT&T objects to the request as an improper attempt by BellSouth to secure valuable, competitively sensitive information intended to give BellSouth an advantage in any future negotiations that might take place between AT&T and BellSouth, when and if AT&T does enter the local exchange market in Florida. AT&T submits that the forced disclosure of such information in this docket would improperly influence the bargaining positions of the respective parties, contrary to the intent of Section 364.161(1), Florida Statutes, when and if AT&T does decide to enter the local exchange service market in Florida.

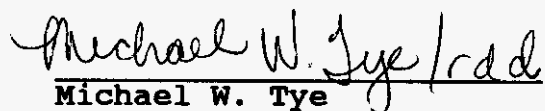
Request No. 4: Same objection as Request No. 3.

Request No. 5: Same objection as Request No. 3.

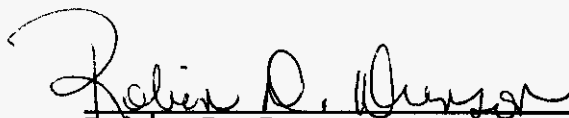
Request No. 6: Same objection as Request No. 3.

Additionally, AT&T objects to this request on the grounds that the applicable documents are protected by the attorney/client privilege and/or the work product privilege.

SUBMITTED this 26th day of December, 1995.



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ATTORNEYS FOR AT&T
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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 26th day of December, 1995:

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A handwritten signature in cursive script that reads "Robin D. Dunson". The signature is written in black ink and is positioned above a horizontal line.

Robin D. Dunson