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ORIGINAL
FILE COPY

January 3, 1996

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 Responses and Objections to BellSouth Telecommunications, Inc.'s First Set of Interrogatories and McCaw Communications of Florida, Inc.'s Responses and Objections to BellSouth Telecommunications, Inc.'s First Request for Production of Documents 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.

- ACK
- AFA _____
- APP _____
- CAF _____
- CMU *Chase*
- CTR _____
- EAG _____
- LEG 1 PRS/amb
- LIN 5 Enclosures
- OPC _____ cc: William H. Higgins, Esq.
- RCH _____ Parties of Record
- SEC 1
- WAS _____
- OTH _____

Interrog
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DOCUMENT NUMBER-DATE
00084 JAN-3 96
FPSC-RECORDS/REPORTING

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JAN 3 1996
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of McCaw Communications of Florida, Inc.'s Responses and Objections to BellSouth Telecommunications, Inc.'s First Request for Production of Documents and McCaw Communications of Florida, Inc.'s Responses and 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 3rd day of January, 1996 to the following parties of record:

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By: 
Norman H. Horton, Jr.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL
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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: January 3, 1996
local exchange companies pursuant)
to Section 364.162, Florida)
Statutes)
_____)

**MCCAW COMMUNICATIONS OF FLORIDA, INC.'S RESPONSES AND
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 Responses and Objections to the First Set of Interrogatories from BellSouth Telecommunications, Inc. ("BellSouth").

GENERAL OBJECTIONS

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

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

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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 RESPONSES AND OBJECTIONS

1. **Has McCaw been a party to local interconnection dockets or negotiations in states other than Florida?**

Response: 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. **If the answer to Interrogatory No. 1 is affirmative, please provide the name of each state in which such dockets or negotiations have occurred.**

Response: 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. Without waiver of the foregoing, McCaw would state as its response that the question is not applicable given the response to Interrogatory No. 1.

3. For each state listed in response to Interrogatory No. 2, please provide the following information:

- (a) the docket number and other identifying information if the matter was a docketed proceeding;
- (b) whether an order was rendered and the date of the order;
- (c) if an order was rendered, whether it was for an interim/temporary or permanent arrangement for interconnection;
- (d) if an order was rendered, the date it is to be implemented, or if already implemented, the date of implementation;
- (e) identify all parties or persons participating in the docket;
- (f) if an order was issued, list the technical arrangements contained therein, including the location(s) at which local interconnection is allowed (e.g., tandem, end office, etc.);
- (g) if an order was issued, list each rate associated with the technical arrangements listed in response to

Interrogatory 3(f);

- (h) if an order was issued, identify whether the rate mechanism for local interconnection was 1) usage based; 2) flat rate based; 3) bill and keep; or 4) other (specify);**
- (i) if the rate mechanism for local interconnection is usage based or flat based, identify the specific rate(s).**

Response: 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, to the extent that BellSouth was a party to any dockets or negotiations and to the extent this is public information the information is readily available to BellSouth. Moreover, the interrogatory does not relate to any issue in this docket and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiver of the foregoing, McCaw would state as its response that the question is not applicable given the response to Interrogatory No. 2.

- 4. If McCaw has reached an agreement for interconnection, whether in a docketed matter or otherwise, please describe in detail the provisions of the agreement, including, at a minimum, the**

type of information requested in Interrogatory 3(c) through (i).

Response: 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. Further, to the extent that BellSouth was a party to any dockets or negotiations and to the extent this is public information the information is readily available to BellSouth.

5. For each state listed in response to Interrogatory No. 2, please provide the following information:
- (a) whether an order or agreement concerning universal service has been rendered and if so, the date of such order or agreement;
 - (b) if an order has been rendered, or an agreement reached, the date it is to be implemented, or if already implemented, the date of implementation;
 - (c) if an order has been rendered or an agreement reached,

whether it was for an interim/temporary or permanent arrangement for universal service;

- (d) the affect of such an order or agreement on the local interconnection dockets or agreement if one was reached;
- (e) a summary of the terms and conditions of the order or agreement.

Response: 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. Further, to the extent that BellSouth was a party to any dockets or negotiations and to the extent this is public information the information is readily available to BellSouth.

6. For each state listed in response to Interrogatory No. 2, please provide the following information:

- (a) whether an order or agreement concerning number portability has been rendered and if so, the date of such order or agreement;
- (b) identify all parties participating in any number portability docket or agreement;

- (c) a description of the mechanism ordered for number portability;
- (d) identify all rates (recurring and nonrecurring residential and business) associated with the mechanism listed in 6(c);
- (e) the affect of such an order or agreement on local interconnection agreements or order.

Response: 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. Further, to the extent that BellSouth was a party to any dockets or negotiations and to the extent this is public information the information is readily available to BellSouth.

7. For each state listed in response to Interrogatory No. 2, please provide the following information:

- (a) whether an order or agreement concerning collocation has been rendered and, if so, the date of such order or agreement;
- (b) a description of the terms and conditions of the order or

agreement;

(c) identify all rates associated with the order or agreement;

(d) the affect of such an order or agreement on the local interconnection arrangements or order.

Response: 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. For each state listed in response to Interrogatory No. 2, please provide the total number of local access lines in that state.

Response: 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. For each state identified in response to Interrogatory No. 2,

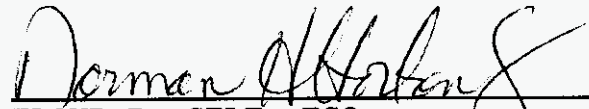
state whether there has been a judicial appeal of any order rendered in the local interconnection docket. If your answer is in the affirmative, please identify the court in which such an appeal lies, the case number, the basis of the appeal and the current status of the appeal.

Response: 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 3rd day of January, 1996.

Respectfully submitted,

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