

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: 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 REQUEST FOR PRODUCTION OF DOCUMENTS**

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 1.280 and 1.350, Florida Rules of Civil Procedure, hereby submits the following Responses and Objections to the First Request for Production of Documents from BellSouth Telecommunications, Inc. ("BellSouth").

SPECIFIC RESPONSES AND OBJECTIONS

1. Provide all documents identified or described in McCaw responses to Interrogatory Nos. 1 through 9 of BellSouth's First Set of Interrogatories to McCaw.

Response: McCaw objects to the production request for the reasons set forth in its Responses and Objections to Interrogatory Nos. 1 through 9 and incorporates those objections herein.

DOCUMENT NUMBER-DATE

00084 JAN-3 96

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2. Provide all documents referred to or relied upon by McCaw in responding to BellSouth's First Set of Interrogatories to McCaw.

Response: McCaw objects to the production request on the basis that the request is burdensome, overly broad and not reasonably calculated to produce admissible evidence.


3. Provide all documents that touch upon, describe, or otherwise address the interconnection rates, terms or conditions that McCaw believes should apply to interconnection between local exchange companies and alternative local exchange companies.

Response: McCaw objects to the production request on the basis that it is overly broad, vague, unduly expensive and burdensome as framed, the request would be impossible to fully satisfy.

Respectfully submitted this 3rd day of January, 1996.

Respectfully submitted,

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