

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

**In re: Resolution of petition(s))
to establish nondiscriminatory)
rates, terms, and conditions for)
resale involving local exchange)
companies and alternative local)
exchange companies pursuant to)
Section 364.161, Florida Statutes)**

**Docket No. 950984-TP
Docket No. 950984A-TP (MFS)
Docket No. 950984B-TP (MCImetro)**

Served: January 4, 1996

**AT&T'S RESPONSES, OBJECTIONS, AND MOTION FOR PROTECTIVE
ORDER WITH RESPECT TO BELL SOUTH 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 Responses, Objections, and Motion for Protective Order
with respect to BellSouth Telecommunications, Inc.'s (hereinafter "BellSouth") First
Request for Production of Documents to AT&T Communications of the Southern States,
Inc. dated December 14, 1995.

OBJECTIONS AND MOTION FOR PROTECTIVE ORDER

Pursuant to the terms of Order No. PSC-95-1083-PCO-TP issued by the Florida
Public Service Commission ("Commission") in the above-referenced docket on August 30,
1995, AT&T served its Objections to BellSouth's First Request for Production of
Documents on December 26, 1995. A copy of such Objections is attached hereto and
incorporated herein by specific reference thereto. AT&T's objections are submitted
pursuant to the authority contained in Slatnick v. Leadership Housing Systems of Florida,
Inc., 368 So.2d 79 (Fla. 3d DCA 1979). To the extent that a Motion for Protective Order

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is required, the objections attached hereto and incorporated herein by specific reference thereto are to be construed as a request for a protective order.

RESPONSES TO SPECIFIC REQUESTS

Subject to and without waiver of its General Objections, Specific Objections, or Motion for Protective Order, AT&T submits the following Responses to specific requests.

Request No. 1: Provide all documents identified or described in AT&T's responses to Interrogatory Nos. 1 through 11 of BellSouth's First Set of Interrogatories to AT&T.

Response: Consistent with AT&T's Objections served on BellSouth on December 26, 1995 and the execution of an appropriate protective agreement, AT&T will produce those documents, if any, set forth in its answers to BellSouth's First Set of Interrogatories to AT&T Communications of the Southern States, Inc. that are not otherwise in BellSouth's possession.

Request No. 2: Provide all documents referred to or relied upon by AT&T in responding to BellSouth's First Set of Interrogatories to AT&T.

Response: Consistent with AT&T's Objections served on BellSouth on December 26, 1995 and the execution of an appropriate protective agreement, AT&T will produce those documents, if any, referred to or relied upon by AT&T in responding to BellSouth's First Set of Interrogatories to AT&T that are not otherwise in BellSouth's possession.

Request No. 3: Provide all documents that touch upon, describe or otherwise address AT&T's position on any necessary discount on resold services which would be required in order to enable AT&T to resell such services.

Response: Consistent with AT&T's Objections served on BellSouth on December 26, 1995 and the execution of an appropriate protective agreement, AT&T will produce those documents that touch upon,

describe or otherwise address AT&T's position on any necessary discount on resold services which would be required in order to enable AT&T to resell local exchange services in Florida.

See Appendix A: Petition of AT&T filed December 21, 1995 with the Georgia Public Service Commission

See Appendix B: Direct Testimony of Wayne F. Fonteix dated July 24, 1995 filed with the Michigan Public Service Commission in Case No. U-10860

See Appendix C: Direct Testimony of James F. Henson dated November 17, 1995 filed with the Wisconsin Public Service Commission in Docket No. 05-TI-138

See Appendix D: Direct Testimony of Lee L. Selwyn dated July 24, 1995 filed with the Michigan Public Service Commission in Case No. U-10860

Request No. 4:

Provide all documents that touch upon, describe or address whether AT&T can resell a local exchange carrier's services without a discount on the retail services' prices charged by the local exchange companies.

Response:

Consistent with AT&T's Objections served on BellSouth on December 26, 1995 and the execution of an appropriate protective agreement, AT&T will produce those documents that touch upon, describe or address whether AT&T can resell a local exchange carrier's services without a discount on the retail services' prices charged by the local exchange companies

Request No. 5:

Provide all documents which analyze, discuss, or otherwise address, the manner in which AT&T plans to or may use a local exchange company's unbundled network elements or resold services in providing service to AT&T's customers.

Response:

Consistent with AT&T's Objections served on BellSouth on December 26, 1995 and the execution of an appropriate protective agreement, AT&T will produce those documents which analyze, discuss, or otherwise address, the manner in which AT&T plans to or may use a local exchange company's unbundled network elements or resold services in providing service to AT&T's customers.

Request No. 6:

Provide all documents analyzing, commenting upon, or otherwise addressing the Stipulation and Agreement reached among several of the parties to this proceeding and so attached to the Motion for Stay filed in this proceeding and others on December 8, 1995.

Response:

Consistent with AT&T's Objections served on BellSouth on December 26, 1995 and the execution of an appropriate protective agreement, AT&T will produce those documents analyzing, commenting upon, or otherwise addressing the Stipulation and Agreement reached among several of the parties to this proceeding and so attached to the Motion for Stay filed in this proceeding and others on December 8, 1995.

SUBMITTED this 4th day of January, 1996.

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