



AT&T

ORIGINAL FILE COPY

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August 12, 1996

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

Docket No. 960833-TP

Dear Mrs. Bayo:

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

Copies of the foregoing are being served on all parties of record in accordance with the attached Certificate of Service.

Yours truly,

Tracy Hatch

Attachments

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

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU Hatch
- CTR \_\_\_\_\_
- EEF \_\_\_\_\_
- LTS 1
- LJI 5
- OPR \_\_\_\_\_
- FOR \_\_\_\_\_
- SEP 1
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE  
08435 AUG 12 1996  
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by AT&T )  
Communications of the Southern ) DOCKET NO. 960833-TP  
States, Inc., for arbitration )  
with BellSouth ) SERVED: August 12, 1996  
Telecommunications, Inc. )  
concerning interconnection and )  
resale under the )  
Telecommunications Act of 1996. )  
\_\_\_\_\_ )

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-96-0933-PCO-TP issued by the  
Florida Public Service Commission (hereinafter the "Commission") in  
the above-referenced docket on July 17, 1996. 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 BellSouth Telecommunications, Inc.'s First Set of Interrogatories which is being served on BellSouth contemporaneously with these objections. Such objections are incorporated herein by specific reference thereto. AT&T will respond to this request to the same extent outlined in its objections to said interrogatories.

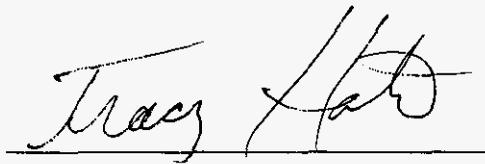
**Request No. 2:** Same objection as Request No. 1.

**Request No. 6:** AT&T objects to this request on the grounds that the request seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Moreover, the request is overly broad,

unduly burdensome, oppressive, and seeks information that is subject to the trade secrets privilege and is beyond the scope of this proceeding.

**Request No. 7:** Same objection as Request No. 6.

SUBMITTED this 12th day of August, 1996.

A handwritten signature in cursive script, reading "Tracy Hatch", written over a horizontal line.

Tracy Hatch  
101 N. Monroe St.  
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(904) 425-6364

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

**CERTIFICATE OF SERVICE**

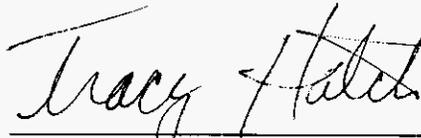
**DOCKET NOS. 960833-TP and 960846-TP**

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 12th day of August, 1996:

BellSouth Telecommunications  
c/o Nancy H. Sims  
150 S. Monroe Street, Suite 400  
Tallahassee, FL 32301

Donna Canzano, Esq.  
Division of Legal Services  
Florida Public Service Comm.  
2540 Shumard Oak Boulevard  
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Richard D. Melson, Esq.  
Hopping Green Sams & Smith  
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Tracy Hatch