

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Matter of the)
Interconnection Agreement)
Negotiations Between AT&T) Docket No. 960833-TP
Communications of The)
Southern States, Inc. and)
BellSouth Telecommunications,) Filed: August 30, 1996
Inc. Pursuant to 47 U.S.C.)
§ 252)
_____)

BELLSOUTH TELECOMMUNICATIONS, INC.'S
OBJECTIONS TO AT&T'S FIRST SET OF INTERROGATORIES

BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), hereby files, pursuant to Rule 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 Objections to AT&T Communications of the Southern States, Inc.'s ("AT&T") First Set of Interrogatories to BellSouth.

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 procedural orders issued by the Florida Public Service Commission ("Commission") in other arbitration dockets. Should additional grounds for objection be discovered as BellSouth prepares its Answers to the above-referenced set of interrogatories, BellSouth reserves the right to supplement, revise, or modify its objections at the time that it serves its Answers on AT&T. Moreover, should BellSouth determine that a Protective Order is necessary with respect to any of the material requested by AT&T, BellSouth reserves the right to file a motion with the Commission seeking such an order at the time that it serves its Answers on AT&T.

DOCUMENT NUMBER-DATE

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GENERAL OBJECTIONS

BellSouth makes the following General Objections to AT&T's First Set of Interrogatories which will be incorporated by reference into BellSouth's specific responses when its Answers are served on AT&T.

1. BellSouth objects to the interrogatories to the extent that such interrogatories seek to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such requests are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

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

3. BellSouth objects to each and every interrogatory and instruction to the extent that such interrogatory 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. BellSouth objects to each and every 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. Any Answers provided by BellSouth in response to AT&T's interrogatories will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth objects to each and every 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. BellSouth will attempt to note each instance where this objection applies.

6. BellSouth objects to AT&T's discovery requests, instructions and definitions, insofar as they seek to impose obligations on BellSouth which exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

7. BellSouth objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

8. BellSouth objects to each and every interrogatory, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. BellSouth objects to each and every interrogatory to the extent that the information requested constitute "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that AT&T's interrogatories request proprietary confidential business information which is not subject to the "trade secrets" privilege, BellSouth will make such information available to counsel for AT&T pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

OBJECTIONS TO SPECIFIC INTERROGATORIES

10. With respect to Interrogatory No. 1, BellSouth objects to this request to the extent that it applies to areas other than BellSouth's regulated intrastate operations in Florida. To the extent that any request is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission, BellSouth objects to such requests as irrelevant, overly broad, unduly burdensome, and oppressive. Further, BellSouth objects to this request on the grounds that such requests are overly broad, unduly burdensome, oppressive, and are not permitted by applicable discovery rules.

11. With respect to Interrogatory No. 2, BellSouth objects to this request on the grounds that it 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. Further, BellSouth objects to this request on the grounds that it requests information that is highly sensitive, particularly with regard to competitors. Moreover, BellSouth objects to this request on the grounds that such requests are overly broad, unduly burdensome, oppressive, and are not permitted by applicable discovery rules.

12. With respect to Interrogatory Nos. 4, 6, 42, 44, 45, 46, 47, and 49, BellSouth objects to this request to the extent that it applies to areas other than BellSouth's regulated intrastate operations in Florida. To the extent that any request is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission,

BellSouth objects to such requests as irrelevant, overly broad, unduly burdensome, and oppressive.

13. With respect to Interrogatory Nos. 14 and 15, BellSouth objects to this request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this proceeding.

14. With respect to Interrogatory No. 35, BellSouth objects to this request on the grounds that it is overly broad, unduly burdensome, and not relevant to respond to requests regarding out of date material, i.e., earlier versions of cost studies. This objection notwithstanding, BellSouth plans to restrict its responses to requests regarding current cost studies.

15. With respect to Interrogatory Nos. 37 and 38, BellSouth objects to this request on the grounds that such requests are overly broad, unduly burdensome, oppressive, and are not permitted by applicable discovery rules.

16. With respect to Interrogatory No. 39, BellSouth objects to this request to the extent that it applies to areas other than BellSouth's regulated intrastate operations in Florida. To the extent that any request is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission, BellSouth objects to such requests as irrelevant, overly broad, unduly burdensome, and oppressive. Further, BellSouth objects to this request on the grounds that it is overly broad, unduly burdensome, and not relevant to respond to requests regarding out of date material, i.e., earlier versions of cost studies. This objection notwithstanding, BellSouth plans

to restrict its responses to requests regarding current cost studies.

17. With respect to Interrogatory Nos. 41 and 48, BellSouth objects to this request to the extent that it applies to areas other than BellSouth's regulated intrastate operations in Florida. To the extent that any request is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission, BellSouth objects to such requests as irrelevant, overly broad, unduly burdensome, and oppressive. Further, BellSouth objects to this request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this proceeding.

Respectfully submitted this 30th day of August, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.

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CERTIFICATE OF SERVICE

DOCKET NO. 960833-TP

DOCKET NO. 960846-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express this 30th day of August, 1996 to the following:

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