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Legal Department

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BellSouth Telecommunications, Inc.  
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September 27, 1996

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

RE: Docket No. [REDACTED]-TP; 960816-TP; 960915-TP

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Objections to Staff's Second Set of Interrogatories. Please file these documents in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served on the parties shown on the attached Certificate of Service.

Sincerely,

*Nancy B. White*  
Nancy B. White (22)

Enclosures

cc: All Parties of Record  
A. M. Lombardo  
R. G. Beatty  
W. J. Ellenberg

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 2
- LIN 5
- DPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1
- NAS \_\_\_\_\_
- DTH \_\_\_\_\_

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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 27th day of September, 1996 to the following:

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*Nancy B. White*  
(22)

CERTIFICATE OF SERVICE  
DOCKET NO. 960916-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express this 27th day of September, 1996 to the following:

Staff Counsel  
Florida Public Service  
Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399

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Washington, D.C. 20036

Nancy B. White  
(2)

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petitions by AT&T	)	
Communications of the Southern	)	
States, Inc., MCI	)	Docket No. 960833-TP
Telecommunications Corporation,	)	
MCI Metro Access Transmission	)	
Services, Inc., American	)	Docket No. 960846-TP
Communications Services, Inc.	)	
and American Communications	)	
Services of Jacksonville, Inc.	)	Docket No. 960916-TP
for arbitration of certain terms	)	
and conditions of a proposed	)	
agreement with BellSouth	)	
Telecommunications, Inc.	)	
concerning interconnection and	)	Filed: September 27, 1996
resale under the	)	
Telecommunications Act of 1996	)	
	)	

BELLSOUTH TELECOMMUNICATIONS, INC.'S  
 OBJECTIONS TO STAFF'S  
SECOND 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 the Staff of the Florida Public Service Commission's ("Staff") Second 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 the procedural order issued by the Florida Public Service Commission ("Commission") in these arbitration dockets. Should additional grounds for objection be discovered as BellSouth prepares its Answers to the above

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referenced set of requests, BellSouth reserves the right to supplement, revise, or modify its objections at the time that it serves its Answers on Staff. Moreover, should BellSouth determine that a Protective Order is necessary with respect to any of the material requested by Staff, BellSouth reserves the right to file a motion with the Commission seeking such an order at the time that it serves its Answers on Staff.

#### GENERAL OBJECTIONS

BellSouth makes the following General Objections to Staff's Second Set of Interrogatories which will be incorporated by reference into BellSouth's specific responses when its Answers are served on Staff.

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 Staff'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 providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

4. 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 Staff'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 Staff pursuant to an appropriate Notice of Intent to Request Confidential Classification, subject to any other general or specific objections contained herein.

#### OBJECTIONS TO SPECIFIC INTERROGATORIES

9. With respect to Interrogatory Nos. 7-29, BellSouth objects to these requests to the extent that it applies to areas other than BellSouth's regulated intrastate operations in Florida and to persons other than BellSouth. To the extent that any request is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission or to persons other than BellSouth, BellSouth objects

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

Respectfully submitted this 27th day of September, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty  
ROBERT G. BEATTY (22)

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c/o Nancy Sims  
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