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November 15, 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. 960786-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 Set of Interrogatories.

Yours truly,

Marsha E. Rule

Marsha E. Rule

ACK

AFA

APP

CAF

CMU

CTR

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SEC

WAS

OTH

Attachments

cc: Parties of Record

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of)
BellSouth Telecommunications,)
Inc.'s entry into interLATA)
services pursuant to Section 271)
of the Federal Telecommunications)
Act of 1996)
_____)

Docket No. 960786-TL

Filed: November 15, 1996

AT&T'S OBJECTIONS TO BELLSOUTH TELECOMMUNICATIONS, INC.'S
FIRST INTERROGATORIES (NO. 1-10)

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 1.340 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following Objections to BellSouth Telecommunications, Inc.'s (hereinafter "BellSouth") First Set of Interrogatories 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-96-0945-PCO-TP issued by the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced docket on July 19, 1996. Should additional grounds for objection be discovered as AT&T prepares its responses to the above-referenced set of interrogatories, 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

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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 Interrogatories which will be incorporated by reference into AT&T's specific responses when its answers are served on BellSouth.

1. AT&T objects to the following provisions of the "Definitions" section of BellSouth's First Set of Interrogatories:

Paragraph 1: AT&T objects to the definitions of "you" and "your" to the extent that such definitions seek to impose an obligation on AT&T Communications of the Southern States, Inc. to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such definition is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. Without waiver of its general objection, and subject to other general and specific objections, Answers will be provided on behalf of AT&T Communications of the Southern States, Inc. which is the interexchange carrier (hereinafter "IXC") certificated to provide regulated telecommunications services in Florida and which is a party to this docket. All references to "AT&T" in responding to BellSouth's interrogatories should be taken to mean AT&T Communications of the Southern States, Inc.

2. Unless otherwise indicated, AT&T has interpreted BellSouth's interrogatories to apply to AT&T'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, AT&T objects to such interrogatory as irrelevant, overly broad, unduly burdensome, and oppressive.

3. AT&T 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. AT&T objects to each and every interrogatory insofar as the interrogatory 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 AT&T in response to BellSouth's interrogatories will be provided subject to, and without waiver of, the foregoing objection.

5. AT&T objects to each and every interrogatory insofar as the interrogatory 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 interrogatory, 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 interrogatory 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 interrogatories request proprietary confidential business information which is not subject to 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.

Objections to Specific Interrogatories

Subject to, and without waiver of, the foregoing general objections, AT&T enters the following specific objections with respect to BellSouth's interrogatories:

Interrogatory No. 1: Pursuant to the General Objections stated above, AT&T will limit its response to this interrogatory to information regarding the regulated intrastate operations of AT&T Communications of the Southern States, Inc., which operates in the states of Florida, Georgia, South Carolina, and North Carolina. In addition to the General Objections stated above, AT&T specifically

objects to any portion of the interrogatory which may call for information regarding entities other than AT&T Communications of the Southern States, Inc. on the grounds that such interrogatory is irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

More specifically, AT&T objects to this interrogatory on the following grounds:

A. AT&T objects to this interrogatory insofar as it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. The number of AT&T's subscribers in Florida relates to neither the presence of one or more interconnected facilities-based providers in BellSouth's territory nor the elements of the Section 271 competitive checklist.

B. AT&T objects to this interrogatory to the extent that the information requested contains or constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that BellSouth's interrogatories request proprietary confidential business information which is confidential but not subject to 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.

Interrogatory No. 4: Pursuant to the General Objections stated above, AT&T will limit its response to this interrogatory to information regarding the regulated intrastate operations of AT&T Communications of the Southern States, Inc., which operates in the

states of Florida, Georgia, South Carolina, and North Carolina. In addition to the General Objections stated above, AT&T specifically objects to any portion of the interrogatory which may call for information regarding entities other than AT&T Communications of the Southern States, Inc. on the grounds that such interrogatory is irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

More specifically, AT&T objects to this interrogatory on the following grounds:

A. AT&T objects to this interrogatory insofar as it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action, in that it relates to neither the presence of one or more interconnected facilities-based providers in BellSouth's territory nor the elements of the Section 271 competitive checklist.

B. AT&T objects to this interrogatory to the extent that the information requested contains or constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that BellSouth's interrogatories request proprietary confidential business information which is confidential but not subject to 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.

Interrogatory No. 5: Pursuant to the General Objections stated above, AT&T will limit its response to this interrogatory to information regarding the regulated intrastate operations of AT&T

Communications of the Southern States, Inc., which operates in the states of Florida, Georgia, South Carolina, and North Carolina. In addition to the General Objections stated above, AT&T specifically objects to any portion of the interrogatory which may call for information pertaining to entities other than AT&T Communications of the Southern States, Inc. on the grounds that such interrogatory is irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

More specifically, AT&T objects to this interrogatory on the following grounds:

A. AT&T objects to this interrogatory insofar as it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action, in that the information requested regarding entities other than AT&T Communications of the Southern States, Inc. relates to neither the presence of one or more interconnected facilities-based providers in BellSouth's territory nor the elements of the Section 271 competitive checklist.

Interrogatory No. 6: Pursuant to the General Objections stated above, AT&T will limit its response to this interrogatory to information regarding the regulated intrastate operations of AT&T Communications of the Southern States, Inc., which operates in the states of Florida, Georgia, South Carolina, and North Carolina. In addition to the General Objections stated above, AT&T specifically objects to any portion of the interrogatory which may call for information regarding entities other than AT&T Communications of the Southern States, Inc. on the grounds that such interrogatory is

irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

More specifically, AT&T objects to this interrogatory on the following grounds:

A. AT&T objects to this interrogatory insofar as 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 interrogatories.

B. AT&T objects to providing this information to the extent that such information is already in the public records before the Florida Public Service Commission.

Interrogatory No. 7: Pursuant to the General Objections stated above, AT&T will limit its response to this interrogatory to information regarding the regulated intrastate operations of AT&T Communications of the Southern States, Inc., which operates in the states of Florida, Georgia, South Carolina, and North Carolina. In addition to the General Objections stated above, AT&T specifically objects to any portion of the interrogatory which may call for information regarding entities other than AT&T Communications of the Southern States, Inc. on the grounds that such interrogatory is irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

More specifically, AT&T objects to this interrogatory on the following grounds:

A. AT&T objects to this interrogatory to the extent that the information requested contains or constitutes "trade secrets" which

are privileged pursuant to Section 90.506, Florida Statutes. To the extent that BellSouth's interrogatories request proprietary confidential business information which is confidential but not subject to 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.

B. AT&T objects to providing this information to the extent that such information is already in the public records before the Florida Public Service Commission.

Interrogatory No. 8: Pursuant to the General Objections stated above, AT&T will limit its response to this interrogatory to information regarding the regulated intrastate operations of AT&T Communications of the Southern States, Inc., which operates in the states of Florida, Georgia, South Carolina, and North Carolina. In addition to the General Objections stated above, AT&T specifically objects to any portion of the interrogatory which may call for information regarding entities other than AT&T Communications of the Southern States, Inc. on the grounds that such interrogatory is irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

More specifically, AT&T objects to this interrogatory on the following grounds:

A. AT&T objects to this interrogatory insofar as it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action, in that the information requested relates to neither the presence

of one or more interconnected facilities-based providers in BellSouth's territory nor the elements of the Section 271 competitive checklist.

B. AT&T objects to this interrogatory to the extent that the information requested contains or constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that BellSouth's interrogatories request proprietary confidential business information which is confidential but not subject to 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.

C. AT&T objects to providing this information to the extent that such information is already in the public records before the Florida Public Service Commission.

Interrogatory No. 9: Pursuant to the General Objections stated above, AT&T will limit its response to this interrogatory to information regarding the regulated intrastate operations of AT&T Communications of the Southern States, Inc., which operates in the states of Florida, Georgia, South Carolina, and North Carolina. In addition to the General Objections stated above, AT&T specifically objects to any portion of the interrogatory which may call for information regarding entities other than AT&T Communications of the Southern States, Inc. on the grounds that such interrogatory is irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

More specifically, AT&T objects to this interrogatory on the following grounds:

A. AT&T objects to this interrogatory insofar as it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action, in that the information requested relates to neither the presence of one or more interconnected facilities-based providers in BellSouth's territory nor the elements of the Section 271 competitive checklist.

B. AT&T objects to this interrogatory to the extent that the information requested contains or constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that BellSouth's interrogatories request proprietary confidential business information which is confidential but not subject to 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.

Interrogatory No. 10: Pursuant to the General Objections stated above, AT&T will limit its response to this interrogatory to information regarding the regulated intrastate operations of AT&T Communications of the Southern States, Inc., which operates in the states of Florida, Georgia, South Carolina, and North Carolina. In addition to the General Objections stated above, AT&T specifically objects to any portion of the interrogatory which may call for information regarding entities other than AT&T Communications of the Southern States, Inc. on the grounds that such interrogatory is

irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

More specifically, AT&T objects to this interrogatory on the following grounds:

A. AT&T objects to this interrogatory insofar as it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action, in that the information requested relates to neither the presence of one or more interconnected facilities-based providers in BellSouth's territory nor the elements of the Section 271 competitive checklist.

B. AT&T objects to this interrogatory to the extent that the information requested contains or constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that BellSouth's interrogatories request proprietary confidential business information which is confidential but not subject to 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.

SUBMITTED this 15th day of November, 1996.

Marsha E. Rule sf
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ATTORNEY FOR AT&T COMMUNICATIONS
OF THE SOUTHERN STATES, INC.

CERTIFICATE OF SERVICE

DOCKET NO. 960786-TL

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 15th day of November, 1996:

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