



AT&T

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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 Request for Production of Documents.

Yours truly,

Marsha E. Rule
df

Marsha E. Rule

- ACK
- AFA
- APP
- CAF
- CMU *Green*
- CTR Attachments
- EAG
- LEG *2*
- LIN *5*
- OFC
- RCH
- SEC *1*
- WAS
- OTH

cc: Parties of Record

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12189 NOV 15 8

FPSC-RECORDS REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of) Docket No. 960786-TL
BellSouth Telecommunications,)
Inc.'s entry into interLATA)
services pursuant to Section 271) Filed: November 15, 1996
of the Federal 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-96-0945-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 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

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FPSC-RECORDS/REPORTING

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. 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: Pursuant to the General Objections stated above, AT&T will limit its response to this request to documents that apply to 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 request which may call for documents pertaining to entities other than AT&T Communications of the Southern States, Inc. on the grounds that such request is irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

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

A. AT&T objects to this request 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 type and location of AT&T's long distance network facilities relate 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 further objects to this request 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 requests 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.

Request No. 2: Pursuant to the General Objections stated above, AT&T will limit its response to this request to documents

that apply to 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 request which may call for documents pertaining to entities other than AT&T Communications of the Southern States, Inc. on the grounds that such request is irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

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

A. AT&T objects to this request 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. Consumer preferences relate 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 further objects to this request 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 requests 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 further objects to this request insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written. As a provider of long distance services, AT&T has compiled a great deal of marketing research and information relating to consumer preferences for long distance services. In order to comply with this request AT&T would have to produce virtually all of its advertising and customer service materials. Additionally, the request would have the effect of penalizing AT&T for its intervention in this case by forcing it to search files and provide documents which relate 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.

D. AT&T further objects to this request 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 requests, particularly as the request relates to AT&T's provision of interLATA telephone service.

Request No. 3: Pursuant to the General Objections stated above, AT&T will limit its response to this request to documents that apply to 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 request which may call for documents pertaining to entities other than AT&T Communications of the

Southern States, Inc. on the grounds that such request is irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

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

A. AT&T objects to this request 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. Brand comparisons relate 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 further objects to this request 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 requests 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 further objects to this request 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 requests, particularly as the request relates to AT&T's provision of interLATA telephone service.

Request No. 4: Pursuant to the General Objections stated above, AT&T will limit its response to this request to documents that apply to 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 request which may call for documents pertaining to entities other than AT&T Communications of the Southern States, Inc. on the grounds that such request is irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

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

A. AT&T objects to this request 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. AT&T's projections, if any, relating to the BellSouth's potential interLATA business relate 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 further objects to this request 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 requests 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.

Requests No. 5, 6, 7, 8 and 9: Pursuant to the General Objections stated above, AT&T will limit its response to these requests to documents that apply to 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 requests which may call for documents pertaining to entities other than AT&T Communications of the Southern States, Inc. on the grounds that such request is irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

More specifically, AT&T objects to these requests on the following grounds:

A. AT&T objects to these requests insofar as they are not reasonably calculated to lead to the discovery of admissible evidence and are not relevant to the subject matter of this action. AT&T's discussion of BellSouth's interLATA plans, AT&T's or other carriers' business responses to BellSouth's interLATA plans, the competitive interLATA environment in general, the interLATA marketing programs of AT&T or its competitors or AT&T's decision whether to bid for or become a supplier of services to BellSouth relate 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 further objects to these requests 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 requests 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 further objects to these requests to the extent that they call for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege, particularly with regard to documents prepared in connection with its ongoing arbitration proceeding before the Florida Public Service Commission.

Request No. 10: Pursuant to the General Objections stated above, AT&T will limit its response to this request to documents that apply to 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 request which may call for documents pertaining to entities other than AT&T Communications of the Southern States, Inc. on the grounds that such request is irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

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

A. AT&T objects to this request 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. AT&T's analysis, if any, relating to future dealings with BellSouth by AT&T or any other provider 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 further objects to this request 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 requests 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 further objects to this request 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 requests, such as the instruction to provide documents that discuss or analyze whether BellSouth's entry into the interLATA business "may affect its dealings" with AT&T or other providers.

D. AT&T further objects to providing these documents to the extent that such information is already in the public records before the Florida Public Service Commission.

Request No. 11: Pursuant to the General Objections stated above, AT&T will limit its response to this request to documents that apply to 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 request which may call for documents pertaining to entities other than AT&T Communications of the Southern States, Inc. on the grounds that such request is irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

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

A. AT&T objects to this request 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. AT&T's analysis, if any, regarding whether BellSouth's entry into the interLATA business may affect competition for exchange or exchange access service 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 further objects to this request to the extent that it calls for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

C. AT&T further objects to this request 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 requests 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.

D. AT&T further objects to providing these documents to the extent that such information is already in the public records before the Florida Public Service Commission.

Request No. 12: Pursuant to the General Objections stated above, AT&T will limit its response to this request to documents that apply to 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 request which may call for documents pertaining to entities other than AT&T Communications of the Southern States, Inc. on the grounds that such request is irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

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

A. AT&T objects to this request 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. AT&T's analysis, if any, regarding various firms' projected revenues, subscribers, market share or contribution from eventual provision of telephone exchange service 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 further objects to this request to the extent that it calls for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

C. AT&T further objects to this request 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 requests 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.

Request No. 13: Pursuant to the General Objections stated above, AT&T will limit its response to this request to documents that apply to 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 request which may call for documents pertaining to entities other than AT&T Communications of the Southern States, Inc. on the grounds that such request is irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

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

A. AT&T objects to this request 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. AT&T's analysis, if any, regarding the competitive environment for providing telephone exchange service 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 further objects to this request to the extent that it calls for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

C. AT&T further objects to this request 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 requests 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.

D. AT&T further objects to this request 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 requests, particularly with regard to the requirement that AT&T produce documents that ``discuss . . . the competitive environment for providing telephone exchange service.''

E. AT&T further objects to providing these documents to the extent that such information is already in the public records before the Florida Public Service Commission.

Requests No. 14 and 15: Pursuant to the General Objections stated above, AT&T will limit its response to these requests to documents that apply to 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 request which may call for documents pertaining to entities other than AT&T Communications of the Southern States, Inc. on the grounds that such request is irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

More specifically, AT&T objects to these requests on the following grounds:

A. AT&T objects to these requests insofar as they are not reasonably calculated to lead to the discovery of admissible evidence and are not relevant to the subject matter of this action. AT&T's analysis, if any, regarding the competitive environment for providing exchange access or BellSouth's competitive strengths and weaknesses as a provider of exchange and exchange access service relate 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 further objects to these requests to the extent that they call for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

C. AT&T further objects to these requests 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 requests 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.

D. AT&T further objects to providing these documents to the extent that such information is already in the public records before the Florida Public Service Commission.

Request No. 16: Pursuant to the General Objections stated above, AT&T will limit its response to this request to documents

that apply to 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 request which may call for documents pertaining to entities other than AT&T Communications of the Southern States, Inc. on the grounds that such request is irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

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

A. AT&T objects to this request 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 nature and existence of proposals or advertising material relating to possible provision of telephone exchange or exchange access service to AT&T by non-BellSouth providers 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 further objects to providing these documents to the extent that such information is already in the public records before the Florida Public Service Commission.

Request No. 17: Pursuant to the General Objections stated above, AT&T will limit its response to this request to documents that apply to 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 request which may call for documents pertaining to entities other than AT&T Communications of the Southern States, Inc. on the grounds that such request is irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

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

A. AT&T objects to this request 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 requests 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 further objects to providing these documents to the extent that such information is already in the public records before the Florida Public Service Commission.

Request No. 18: Pursuant to the General Objections stated above, AT&T will limit its response to this request to documents that apply to 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 request which may call for documents pertaining to entities other than AT&T Communications of the Southern States, Inc. on the grounds that such request is irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

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

A. AT&T objects to this request 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. AT&T's possible use of facilities or services of any company other than BellSouth to provide telephone exchange or exchange access 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 request 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 requests 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 further objects to providing these documents to the extent that such information is already in the public records before the Florida Public Service Commission.

Request No. 19: Pursuant to the General Objections stated above, AT&T will limit its response to this request to documents that apply to 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 request which may call for documents pertaining to entities other than AT&T Communications of the Southern States, Inc. on the grounds that such request is irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

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

A. AT&T objects to this request 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 requests 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 further objects to this request 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 requests, particularly with regard to the global nature of the requirement that AT&T

produce documents relating to "utilization of private line facilities that interconnect with interexchange carriers".

Requests No. 20 and 21: Pursuant to the General Objections stated above, AT&T will limit its response to these requests to documents that apply to 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 requests which may call for documents pertaining to entities other than AT&T Communications of the Southern States, Inc. on the grounds that such request is irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

More specifically, AT&T objects to these requests on the following grounds:

A. AT&T further objects to these requests 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 requests 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.

Requests No. 22 - 26: Pursuant to the General Objections stated above, AT&T will limit its response to these requests to documents that apply to 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 requests which may call for documents pertaining to entities other than AT&T Communications of the Southern States, Inc. on the grounds that such request is irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

More specifically, AT&T objects to these requests on the following grounds:

A. AT&T objects to these requests insofar as they are not reasonably calculated to lead to the discovery of admissible evidence and are not relevant to the subject matter of this action. AT&T's plans to monitor quality of service by other providers, requests and responses regarding AT&T's provision of international circuits, BellSouth's competitive strengths and weaknesses as an interLATA provider and its service bundling plans relate 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 further objects to these requests 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 requests 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 further objects to providing these documents to the extent that such information is already in the public records before the Florida Public Service Commission.

Request No. 27: Pursuant to the General Objections stated above, AT&T will limit its response to this request to documents that apply to 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 request which may call for documents pertaining to entities other than AT&T Communications of the Southern States, Inc. on the grounds that such request is irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

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

A. AT&T objects to this request 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. AT&T's analysis, if any, regarding its future packaging of telecommunications services 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 further objects to this request 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 requests 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 further objects to providing these documents to the extent that such information is already in the public records before the Florida Public Service Commission.

Requests No. 28 and 29: Pursuant to the General Objections stated above, AT&T will limit its response to these requests to documents that apply to 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 request which may call for documents pertaining to entities other than AT&T Communications of the Southern States, Inc. on the grounds that such request is irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

More specifically, AT&T objects to these requests on the following grounds:

A. AT&T objects to these requests insofar as they are not reasonably calculated to lead to the discovery of admissible

evidence and are not relevant to the subject matter of this action. AT&T's analysis, if any, regarding future pricing of interLATA services and the effect of BellSouth's entry into the interLATA market 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 further objects to these requests 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 requests 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 further objects to providing these documents to the extent that such information is already in the public records before the Florida Public Service Commission.

Request No. 30: Pursuant to the General Objections stated above, AT&T will limit its response to this request to documents that apply to 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 requests which may call for documents pertaining to entities other than AT&T Communications of the Southern States, Inc. on the grounds that such request is

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

A. AT&T objects to this request 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. AT&T's comparison of BellSouth's potential long distance network with the network of any current interexchange carrier 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 further objects to these requests 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 requests 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 further objects to providing these documents to the extent that such information is already in the public records before the Florida Public Service Commission.

SUBMITTED this 15th day of November, 1996.

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ATTORNEY FOR AT&T COMMUNICATIONS
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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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