

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth ) DOCKET NO. 960786-TL
Telecommunications, Inc. entry into )
InterLATA services pursuant to Section) FILED: 5-27-97
271 of the Federal Telecommunications )
Act of 1996. )

ORIGINAL FILE COPY

NONPARTY NOTICE OF GENERAL OBJECTION

The Telephone Company of Central Florida (TCCF), by its undersigned attorney, hereby serves Notice of General Objection to Staff's First Set of Interrogatories (Nos. 1-21) to TCCF. The grounds for this objection are as follows:

Staff served interrogatories on TCCF in staff's capacity as a party pursuant to Rule 25-22.006, Florida Administrative Code. Although staff relies on Section 364.183(1), Florida Statutes, regarding access to company records, to require nonparty telecommunications companies to respond to discovery, Section 364.183(2) requires that discovery in any docket or proceeding before the Commission shall be in the manner provided for in Rule 1.280, Florida Rules of Civil Procedure. In its role as a party - as distinct from its role as alter ego for agency head - staff, pursuant to Rule 25-22.034, Florida Administrative Code, may obtain

ACK ✓ discovery through the means and in the matter provided in Rules
AFA 1.280 - 1.400, Florida Rules of Civil Procedure.
APP
CAF

CMU Discovery through interrogatories may be made by a party
CTR pursuant to Rule 1.340, Florida Rules of Civil Procedure, which
EAG states in pertinent part as follows:

LEG Without leave of court, any party may serve upon any other
LIN 5 party written interrogatories to be answered . . .

OPC TCCF is a nonparty to this proceeding and thus neither staff,

RCH
SEC 1
TAS

DOCUMENT NUMBER-DATE

05255 MAY 27 96

FPSC-RECORDS/REPORTING

acting as a party, nor any other party in this proceeding, may seek discovery of information by serving interrogatories on TCCF as if it were a party.

Because TCCF is not a party in this proceeding, it is not obligated to respond to staff's interrogatories. Nevertheless, TCCF will respond to specific interrogatories as a nonparty. By so responding, TCCF does not waive but rather specifically reserves objections that it might otherwise make in response to Staff's First Set of Interrogatories; moreover, in responding to these interrogatories as a non-party TCCF does not waive but rather reserves its right to object to future interrogatories served on TCCF in this docket. With these caveats and reservations noted, TCCF intends to respond in good faith in the time period set out in Order No. PSC-96-0945-PCO-TL.

Respectfully submitted, this 27th day of May, 1997.



---

Donna L. Canzano  
Wiggins & Villacorta, P.A.  
501 East Tennessee Street  
Suite B  
Post Office Drawer 1657  
Tallahassee, Florida 32302  
(904) 222-1534

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail this 27th day of May, 1997, to the following:

Jeffrey J. Walker  
Regulatory Counsel  
Preferred Carrier Services,  
Inc.  
1425 Greenway Drive  
Suite 210  
Irving, Texas 75038

Richard M. Rindler  
Swidler & Berlin, Chartered  
3000 K Street, N.W.  
Suite 300  
Washington, D.C. 20007

Andrew O. Isar  
Director-Industry Relations  
Telecommunications Resellers  
Assoc.  
P.O. Box 2461  
Gig Harbor, WA 98335-4461

Monica Barone  
Division of Legal Services  
Florida Public Service Comm.  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399

Patricia Kurlin  
Intermedia Communications Inc.  
3625 Queen Palm Drive  
Tampa, FL 33619-1309

Rick Melson  
Hopping Green Sams & Smith  
123 South Calhoun Street  
Post Office Box 6526  
Tallahassee, FL 32314

C. Everett Boyd, Jr.  
Ervin, Varn, Jacobs,  
Odom & Ervin  
P.O. Drawer 1170  
Tallahassee, FL 32302

Floyd R. Self  
Messer, Caparello, Madsen,  
Goldman & Metz  
Post Office Box 1876  
Tallahassee, FL 32302-1876

Benjamin W. Fincher  
3100 Cumberland Circle  
Atlanta, GA 30339

Timothy Devine  
MFS Communications Company,  
Inc.  
6 Concourse Parkway  
Suite 2100  
Atlanta, GA 30328

Tracy Hatch  
AT&T  
101 N. Monroe, Suite 700  
Tallahassee, FL 32301

Nancy H. Sims  
Southern Bell Telephone  
Company  
150 S. Monroe St., Suite 400  
Tallahassee, FL 32301

Tom Bond, Esquire  
MCI Telecommunications Corp.  
Suite 700  
780 Johnson Ferry Road  
Atlanta, GA 30342

Robin Dunson  
AT&T  
1200 Peachtree St. NE  
Suite 4038  
Atlanta, GA 30309

Laura Wilson  
310 North Monroe Street  
Tallahassee, FL 32302

Nancy B. White  
William Allenberg  
BellSouth Telecommunications,  
Inc.  
Suite 4300  
675 West Peachtree St., NE  
Atlanta, GA 30375-0001

Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter, Reeves, McGlothlin,  
Davidson, Rief & Bakas, P.A.  
117 South Gadsden Street  
Tallahassee, FL 32301

Peter M. Dunbar  
Robert S. Cohen  
Pennington, Culpepper, Moore,  
Wilkinson, Dunbar & Dunlap  
Post Office Box 10095  
Tallahassee, Fl 32302

Sue E. Weiske  
Time Warner Communications  
160 Inverness Drive West  
3rd Floor North  
Englewood, CO 80112

Robert D. Rubin  
Strategic Technologies, Inc.  
730 N.W. 107th Ave, Ste 304  
Miami, FL 33172-3104

Mark A. Mansour  
NationalTel  
6363 N.W. 6th Way  
Suite 1000  
Ft. Lauderdale, FL 33309-6119

Kenneth A. Hoffman  
William B. Willingham  
Rutledge, Ecenia, Underwood,  
Purnell & Hoffman, P.A.  
P.O. Box 551  
Tallahassee, FL 32302

Paul Kouroupas  
TCG-Washington  
2 Lafayette Centre  
1133 Twenty First Street, N.W.  
Suite 400  
Washington, D.C. 20036

Elder N. Ripper  
Telephone Company of Central  
Florida, Inc.  
3575 West Lake Mary Blvd.  
Suite 107  
Lake Mary, FL 32746-6029

John Murray  
Payphone Consultants, Inc.  
3431 N.W. 55th Street  
Ft. Lauderdale, FL 33309-6308

Domenic P. Altomare  
Intetech, L.C.  
7077 Bonneval Road  
Suite 600  
Jacksonville, FL 32216-6055

Riley M. Murphy  
American Communication Services  
of Jacksonville, Inc.  
131 National Business Parkway  
Suite 100  
Annapolis Junction, MD 20701

Kenneth F. Melley, Jr.  
U.S. Long Distance, Inc.  
9311 San Pedro, Suite 100  
San Antonio, TX 78216

R.P. McFarland  
Interlink Telecommunications  
of Florida, Inc.  
1112 Elm Street  
Covington, GA 30209

John H. Fondren, Jr.  
Hart Communications  
Post Office Box 2151  
Valdosta, GA 31602

Lorinda C. Bucchieri  
Easy Cellular, Inc.  
8625 West Sahara Avenue  
Las Vegas, NV 89117

Gordon Whitley  
East Florida Communications,  
Inc.  
221 South Ridgewood Avenue  
Daytona Beach, FL 32114-4317

Charles J. Beck, Esquire  
Deputy Public Counsel  
c/o The Florida Legislature  
111 West Madison Street  
Room 812  
Tallahassee, FL 32399-1400

Julio C. Fernandez  
Jetcom, Inc.  
22511 S.W. 66th Avenue, #B210  
Boca Raton, FL 33428-5986

Dennis A. Parker  
Unique Communications, Inc.  
3557 N.W. 53rd Court  
Ft. Lauderdale, FL 33309-6344

Mr. Brian Sulmonetti  
LDDS WorldCom Communications  
Suite 400  
1515 S. Federal Highway  
Boca Raton, FL 33432

  
\_\_\_\_\_  
Donna L. Canzano