

ORIGINAL
FILE COPY

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: 6-4-97
271 of the Federal Telecommunications)
Act of 1996.)

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 Second Set of Interrogatories (Nos. 22-87) 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 -

ACK ✓ as distinct from its role as alter ego for agency head - staff,
AFA _____ pursuant to Rule 25-22.034, Florida Administrative Code, may obtain
APP _____
CAF _____ discovery through the means and in the manner provided in Rules
CMU Green 1.280 - 1.400, Florida Rules of Civil Procedure.

CTR _____ Discovery through interrogatories may be made by a party
EAG _____
LEG 1 pursuant to Rule 1.340, Florida Rules of Civil Procedure, which
LIN _____ states in pertinent part as follows:

OPC _____ Without leave of court, any party may serve upon any other
RCH _____ party written interrogatories to be answered . . .

SEC 1
WAS _____ TCCF is a nonparty to this proceeding and thus neither staff,
OTH _____

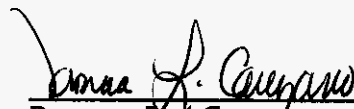
RECEIVED & FILED
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
05570 JUN-4 97
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 nonparty 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 4 th day of June, 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 4th day of June, 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
Sprint Communications Company
3100 Cumberland Circle
Atlanta, GA 30339
MailstopL GAATLNO802

Laura Wilson
Florida Cable Telecommunications
Association, Inc.
310 North Monroe Street
Tallahassee, FL 32302

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

Marsha E. Rule
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

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

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

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

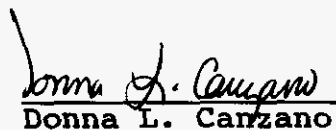
John H. Fondren, Jr.
Hart Communications
Post Office Box 2151
Valdosta, GA 31602

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

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



Donna L. Canzano