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ORIGINAL  
FILE COPY

June 30, 1997

Mrs. Blanca S. Bayó  
Director, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: **Docket No. 960786-TL**  
**Section 271 Docket**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Objections to Florida Competitive Carriers Association's Sixth Set of Interrogatories and Second Request for Production of Documents, which we ask that you file in the captioned matter.

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 to the parties shown on the attached Certificate of Service.

Sincerely,

*Nancy B. White* (kr)

Nancy B. White

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU Screen \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 2 \_\_\_\_\_
- LIN 5 \_\_\_\_\_
- OPD \_\_\_\_\_
- RUC \_\_\_\_\_
- SAC 1 \_\_\_\_\_
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

Enclosures

cc: All parties of record  
A. M. Lombardo  
R. G. Beatty  
William J. Ellenberg II

RECEIVED & FILED  
*[Signature]*  
DIVISION OF RECORDS

DOCUMENT NUMBER-DATE  
06551 JUN 30 97  
FPSO-RECORDS/REPORTING

**CERTIFICATE OF SERVICE**  
**DOCKET NO. 960786-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express this 30th day of June, 1997 to the following:

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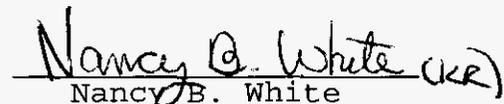
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Nancy B. White

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL  
FILE COPY

|                                     |                      |
|-------------------------------------|----------------------|
| In re: Consideration of BellSouth ) |                      |
| Telecommunications, Inc. entry )    |                      |
| into InterLATA Services pursuant )  | Docket No. 960786-TL |
| to Section 271 of the Federal )     |                      |
| Telecommunications Act of 1996 )    | Filed: June 30, 1997 |
| )                                   |                      |

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**BELLSOUTH TELECOMMUNICATIONS, INC.'S OBJECTIONS  
TO FLORIDA COMPETITIVE CARRIERS ASSOCIATION'S  
SIXTH SET OF INTERROGATORIES**

COMES NOW, BellSouth Telecommunications, Inc.

(`BellSouth' or `Company'), 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 Florida Competitive Carriers Association's (`FCCA') Sixth 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 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 BellSouth prepares its Answers to the above-referenced set of interrogatories, BellSouth reserves the right to supplement, revise, or modify its objections at the time that it serves its Answers on FCCA. Moreover, should BellSouth determine that a Protective Order is necessary with respect to any of the material requested

by FCCA, BellSouth reserves the right to file a motion with the Commission seeking such an order at the time that it serves its Answers on FCCA.

#### GENERAL OBJECTIONS

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

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 FCCA'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 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. BellSouth objects to each and every interrogatory 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 interrogatories. Any Answers provided by BellSouth in response to FCCA's interrogatories will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth objects to each and every interrogatory 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. BellSouth will attempt to note each instance where this objection applies.

6. BellSouth object to FCCA's discovery requests, instructions and definitions, insofar as they seek to impose obligations on BellSouth which exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

7. BellSouth objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

8. BellSouth objects to each and every interrogatory, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. BellSouth 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 FCCA'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 FCCA 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, BellSouth enters the following specific objections with respect to FCCA's interrogatories:

10. With respect to Item Nos. 93-116, BellSouth objects to these interrogatories to the extent there is no time limit and no limitation on the types of systems involved, thereby making each interrogatory unduly burdensome, expensive, or time consuming to attempt a response. In the spirit of cooperation, however, and without waiver of its objection, BellSouth will respond to these interrogatories with regard to systems identified in the FCC order (provisioning, maintenance, ordering, etc.) that support ALECs and the equivalent systems that support BellSouth customers. Further BellSouth will respond to these interrogatories with either Florida specific information or generic information applicable to systems used in Florida.

Respectfully submitted this 30th day of June, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of BellSouth )  
Telecommunications, Inc. entry )  
into InterLATA Services pursuant ) Docket No. 960786-TL  
to Section 271 of the Federal )  
Telecommunications Act of 1996 ) Filed: June 30, 1997  
\_\_\_\_\_ )

**BELLSOUTH TELECOMMUNICATIONS, INC.'S OBJECTIONS  
TO FLORIDA COMPETITIVE CARRIERS ASSOCIATION'S  
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS**

COMES NOW, BellSouth Telecommunications, Inc.

("BellSouth" or "Company"), 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 Florida Competitive Carriers Association's ("FCCA") Second Request for Production of Documents 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 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 BellSouth prepares its Answers to the above-referenced set of document requests, BellSouth reserves the right to supplement, revise, or modify its objections at the time that it serves its Answers on FCCA. Moreover, should BellSouth determine that a Protective Order is necessary with respect to any of the material requested

by FCCA, BellSouth reserves the right to file a motion with the Commission seeking such an order at the time that it serves its Answers on FCCA.

#### GENERAL OBJECTIONS

BellSouth makes the following General Objections to FCCA's Second Request for Production of Documents which will be incorporated by reference into BellSouth's specific responses when its Answers are served on FCCA.

1. BellSouth objects to the document requests 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 FCCA's document requests to apply to BellSouth's regulated intrastate operations in Florida and will limit its Answers accordingly. To the extent that any document request is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission, BellSouth objects to such document request as irrelevant, overly broad, unduly burdensome, and oppressive.

3. BellSouth objects to each and every document request and instruction to the extent that such document 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. BellSouth objects to each and every document 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 document requests. Any Answers provided by BellSouth in response to FCCA's document requests will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth objects to each and every document 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. BellSouth will attempt to note each instance where this objection applies.

6. BellSouth object to FCCA's discovery requests, instructions and definitions, insofar as they seek to impose obligations on BellSouth which exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

7. BellSouth objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

8. BellSouth objects to each and every document request, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. BellSouth objects to each and every document 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 FCCA's document requests request proprietary confidential business information which is not subject to the ``trade secrets'' privilege, BellSouth will make such information available to counsel for FCCA pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

**OBJECTIONS TO SPECIFIC DOCUMENT REQUESTS**

Subject to, and without waiver of, the foregoing general objections, BellSouth enters the following specific objections with respect to FCCA's Document Requests:

10. With respect to Item No.6, BellSouth objects to this document request to the extent there is no time limit and no limitation on the types of systems involved, thereby making each document request unduly burdensome, expensive, or time consuming to attempt a response. In the spirit of cooperation, however, and without waiver of its objection, BellSouth will respond to this document request with regard to systems identified in the FCC order (provisioning, maintenance, ordering, etc.) that support ALECs and the equivalent systems that support BellSouth customers. Further BellSouth will respond to this document request with

either Florida specific information or generic information applicable to systems used in Florida.

Respectfully submitted this 30th day of June, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

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