

ORIGINAL  
FILE COPY



Tracy Hatch  
Attorney

Suite 700  
101 N. Monroe St.  
Tallahassee, FL 32301  
904 425-6364  
FAX: 904 425-6361

July 10, 1997

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

Docket No. **970172-TP**, 970173-TP & 970281-TL

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,

Tracy Hatch

cc: Parties of Record

ACK	<u>✓</u>
MFA	<u>3</u>
ADD	_____
DIR	_____
EN	_____
CTR	_____
EM	_____
LES	<u>2</u>
LE	<u>5</u>
OP	_____
RC	_____
SEC	<u>1</u>
WAS	_____
OTH	<u>1 each Dkt.</u>

RECEIVED & FILED  
  
EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

06940 JUL 10 97

REGISTRY AND REPORTING

ORIGINAL  
FILE COPY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by MCI )  
Telecommunications Corporation )  
for an order requiring BellSouth )  
Telecommunications, Inc. to remove )  
its deregulated payphone investment )  
and associated expenses from its )  
intrastate operations and reduce )  
the Carrier Common Line rate )  
element of its intrastate switched )  
access charges by approximately )  
\$36.5 million as required by the )  
Federal Telecommunications Act )  
of 1996. )

---

Docket No. 970172-TP

Filed: June 10, 1997

In re: Petition by MCI )  
Telecommunications Corporation )  
for an order requiring GTE Florida )  
Incorporated to remove its )  
deregulated payphone investment )  
and associated expenses from its )  
intrastate operations and reduce )  
the Carrier Common Line rate )  
element of its intrastate switched )  
access charges by approximately )  
\$9.6 million as required by the )  
Federal Telecommunications Act )  
of 1996. )

---

Docket No. 970173-TP

In re: Establishment of )  
intrastate implementation )  
requirement governing )  
federally mandated )  
deregulation of local )  
exchange company payphones. )

---

Docket No. 970281-TL

AT&T'S OBJECTIONS TO BELL SOUTH TELECOMMUNICATIONS, INC.'S  
FIRST SET OF INTERROGATORIES

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

DOCUMENT NUMBER-DATE

06940 JUL 10 97

FPSC-RECORDS/REPORTING

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-97-0721-PCO-TP issued by the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced docket on June 19, 1997. Should additional grounds for objection be discovered as AT&T prepares its Answers 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 Answers 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 motion with the Commission seeking such an order at the time that it serves its Answers 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 definition of "AT&T of the Southern States Inc." 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 entity 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 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 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 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

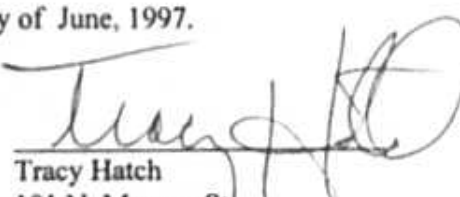
requirements of the Florida Rules of Civil Procedure or Florida law.

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 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.

RESPECTFULLY SUBMITTED this 10<sup>th</sup> day of June, 1997.



Tracy Hatch  
101 N. Monroe St.  
Suite 700  
Tallahassee, FL 32301  
(904) 425-6364  
**ATTORNEY FOR AT&T  
COMMUNICATIONS OF THE  
SOUTHERN STATES, INC.**

**CERTIFICATE OF SERVICE**

**DOCKET NOS. 970172-TP, 970173-TP & 970281-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 10<sup>th</sup> day of July, 1997:

Nancy White, Esq.  
C/o Nancy H. Sims  
BellSouth Telecommunications  
150 S. Monroe St., Suite 400  
Tallahassee, FL 32301

Richard Melson, Esq.  
Hopping Boyd Sams and Smith  
P. O. Box 6526  
Tallahassee, FL 32314

William Cox, Esq.  
Division of Legal Services  
Florida Public Service Comm.  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399

Angela Green, Esq.  
FL Public Telecommunications  
125 S. Gadsden St., Suite 200  
Tallahassee, FL 32301-1525

Michael Henry, Esq.  
MCI Telecommunications  
780 Johnson Ferry Rd., #700  
Atlanta, GA 30342

Martha Brown, Esq.  
Division of Legal Services  
Florida Public Service Comm.  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399

Charles Rehwinkel, Esq.  
Sprint-Florida, Inc.  
P. O. Box 2214 - (MC 2565)  
Tallahassee, FL 32301

Ms. Beverly Menard  
GTE Florida, Incorporated  
106 E. College Ave., Ste. 1440  
Tallahassee, FL 32301

  
Tracy Hatch