

ORIGINAL

Legal Department

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March 30, 1998

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. 980119-TP (Supra Docket)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Objections to Supra Telecommunications and Information Systems, Inc.'s First Set of Interrogatories and First 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 (ke)

Nancy B. White

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU Seriani
- CTR _____
- EAG _____
- LEG 2 _____
- LIN 3 _____
- OPC _____
- RCH _____
- SEC 1 _____
- WAS _____
- OTH _____

Enclosures

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

DOCUMENT NUMBER-DATE

03680 MAR 30 88

FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Supra Telecommunications) Docket No.: 980119-TP
and Information Systems, Inc., Against)
BellSouth Telecommunications, Inc.)
_____) Filed: March 30, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
OBJECTIONS TO SUPRA TELECOMMUNICATIONS
AND INFORMATION SYSTEMS, INC.'S FIRST
SET OF INTERROGATORIES**

BellSouth Telecommunications, Inc., ("BellSouth" or "Company"), hereby files, pursuant to Rule 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 Supra Telecommunications and Information Systems, Inc.'s ("Supra") First 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 the procedural order issued by the Florida Public Service Commission ("Commission") in the above-captioned arbitration docket. Should additional grounds for objection be discovered as BellSouth prepares its Answers to the above-referenced set of requests, BellSouth reserves the right to supplement, revise, or modify its objections at the time that it serves its Answers on Supra. Moreover, should BellSouth determine that a Protective Order is necessary with respect to any of the material requested by Supra, BellSouth reserves the right to file a motion with the Commission seeking such an order at the time that it serves its Answers on Supra.

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

GENERAL OBJECTIONS

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

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 Supra'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 Supra'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 objects to Supra's discovery requests, instructions and definitions, insofar as they seek to impose obligations on BellSouth that 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 constitute "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that Supra'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 Supra pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

10. BellSouth is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, BellSouth 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 that 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 BellSouth after a reasonable and diligent search conducted in connection with this discovery request. BellSouth conducted a search of those files that are reasonably expected to contain the requested information. To the extent that the discovery request purports to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

SPECIFIC OBJECTIONS

11. BellSouth objects to Interrogatory No. 5 on the basis that part of the information requested is public record; BellSouth does not have the information requested in its custody, possession or control; and that the information requested is not relevant to the issues in this docket nor is it calculated to lead to the discovery of admissible evidence.

12. BellSouth objects to Interrogatory No. 9 to the extent that it seeks information regarding carriers other than ALECs on the basis that such information is not relevant to the issues in this docket nor is it calculated to lead to the discovery of admissible evidence.

13. BellSouth objects to Interrogatory No. 11 to the extent that there is no such animal in BellSouth as the "Interconnection Services Bureau". To the extent that Supra refers to the Interconnection Services Department, BellSouth objects on the basis that the request is unduly burdensome and overbroad. Some 8051 people are employed in this department. Requiring BellSouth to provide the information requested for all 8051 people would be unduly burdensome.

14. BellSouth objects to the Interrogatory Nos. 13, 14, 28, 34 and 35 on the basis that, the Prehearing Officer, in Order No. PSC-98-0416-PCO-TP, issued on March 24, 1998, ruled that the issues to which these interrogatories refer were not appropriate. Therefore, BellSouth objects on the grounds that these requests are not relevant nor are they calculated to lead to the discovery of admissible evidence.

15. BellSouth objects to Interrogatory No. 15 to the extent the interrogatory requests the services billed for each individual Supra end user. This request is unduly burdensome and overbroad.

Respectfully submitted this 30th day of March, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (KR)

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