

RECEIVED 0730

08 AUG 25 PM 1998



Tracy Hatch
Attorney

RECEIVED
August 25, 1998

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

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

RE: Dockets No. 980696-TP

Dear Mrs. Bayo:

Enclosed for filing in the above referenced dockets is AT&T of the Southern States, Inc.'s (AT&T) Objections to Staff's First Request for Production of Documents, First Request for Production of Documents Jointly to AT&T and MCI, First Set of Interrogatories and First Set of Interrogatories Jointly to AT&T and MCI in the above captioned docket.

Sincerely,

Tracy Hatch
Tracy Hatch

RECEIVED & FILED

gob
FPSC BUREAU OF RECORDS

Enclosures

cc: All Parties of Record

- ACK _____
- FA 4
- APP _____
- CAF _____
- CMU _____
- CTR _____
- FAG _____
- LEG 2
- LIN 5
- OJC _____
- RCH _____
- SEC 1

**CERTIFICATE OF SERVICE
DOCKET 980696-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via *hand delivery/**Federal Express and U.S. Mail to the following parties of record on this 25th day of August, 1998:

William Cox
Florida Public Service
Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Richard Melson
Hopping Law Firm
Post Office Box 6526
Tallahassee, FL 32314

Jack Shreve
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400

Kimberly Caswell**
GTE Service Incorporated
1 Tampa City Center
201 N. Franklin Street
Tampa, FL 33602

Carolyn Marek
VP of Regulatory Affairs
Southeast Region
Time Warner Communications
Nashville, TN 37221

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

Floyd R. Self
Messer, Caparello & Self,
P.A.
215 S. Monroe Street
Suite 701
Tallahassee, FL 32301-1876

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

Nancy B. White
Robert G. Beatty
c/o Nancy Sims
150 S. Monroe Street
Suite 400
Tallahassee, FL 32301

Norman H. Horton, Jr.
Messer, Caparello & Self,
P.A.
215 S. Monroe Street
Suite 701
Tallahassee, FL 32301-1876

James C. Falvey
e.spire Communications,
Inc.
133 National Business
Parkway
Suite 200
Annapolis Junction, MD
20701

Laura L. Gallagher
Vice President-Regulatory
Affairs
Florida Cable
Telecommunications
Association
310 N. Monroe Street
Tallahassee, FL 32301

Harriet Eudy
ALLTELL Florida, Inc.
Post Office Box 550
Live Oak, FL 32060

John P. Fons
J. Jeffrey Wahlen
Ausley & McMullen
227 South Calhoun Street
Tallahassee, FL 32302

David B. Erwin
127 Riversink Road
Crawfordville, FL 32327

Robert M. Post, Jr.
Post Office Box 277
Indiantown, FL 34956

Mark Ellmer
Post Office Box 220
502 Fifth Street
Port St. Joe, FL 32456

Tom McCabe
Post Office Box 189
Quincy, FL 32353-0189

Lynn B. Hall
Vista-United
Telecommunications
Post Office Box 10180
Lake Buena Vista, FL 32830

Lynne G. Brewer
Northeast Florida Telephone
Co.
Post Office Box 485
Macclenny, FL 32063-0485

Kelly Goodnight
Frontier Communications
180 S. Clinton Avenue
Rochester, NY 14646

Patrick Knight Wiggins
Donna L. Canzano
Wiggins & Villacorta, P.A.
Post Office Drawer 1657
Tallahassee, FL 32302

Steve Brown
Intermedia Communications
Inc.
3625 Queen Palm Drive
Tampa, FL 33619-1309

Michael A. Gross
Assistant Attorney General
Office of the Attorney
General
PL-01, the Capitol
Tallahassee, FL 32399-1050

Charles J. Rehwinkel
Sprint-Florida, Inc.
1313 Blairstone Rd.
Tallahassee, FL 32301

Kenneth A. Hoffman
John R. Ellis
Rutledge, Ecenia, Underwood
Purnell & Hoffman
Post Office Box 551
Tallahassee, FL 32301

Paul Kouroupas
Michael McRae
Teleport Communications
Group, Inc.
2 Lafayette Centre
1133 21st Street, NW
Suite 400
Washington, DC 20036

Suzanne F. Summerlin
1311-B Paul Russell Road
Suite 201
Tallahassee, FL 32301

Peter M. Dunbar
Barbara D. Auger
Pennington, Moore,
Wilkinson, Bell & Dunbar
P.O. Box 10095
Tallahassee, FL 32302

Tracy L. H.

ATTORNEY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Determination of the
cost of basic local
telecommunications service,
pursuant to Section 364.025,
Florida Statutes.

DOCKET NO. 980696-TP

DATED: August 25, 1998

AT&T'S OBJECTIONS TO THE STAFF OF THE
FLORIDA PUBLIC SERVICE COMMISSION'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 1.350 and
1.280(b), Florida Rules of Civil Procedure, hereby submits
the following Objections to the Staff of the Florida Public
Service Commission's (hereinafter "Staff's") 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 five-day requirement set forth in Order No. PSC-98-0813-
PCO-TP issued by the Florida Public Service Commission
(hereinafter the "Commission") in the above-referenced
docket on June 19, 1998. Should additional grounds for
objection be discovered as AT&T prepares its Responses to
the above-referenced set of requests, AT&T reserves the

DOCUMENT NUMBER-DATE

09250 AUG 25 88

FPSC-RECORDS/REPORTING

right to supplement, revise, or modify its objections at the time that it serves its Responses. Moreover, should AT&T determine that a Protective Order is necessary with respect to any of the material requested, AT&T reserves the right to file a motion with the Commission seeking such an order at the time that it serves its Responses.

General Objections

AT&T makes the following General Objections to Staff's First Request for Production of Documents which will be incorporated by reference into AT&T's specific responses when its Responses are served on Staff.

1. AT&T objects to the following provisions of the "Definitions" section of Staff's First Set of Interrogatories 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 Staff's request for production should be taken to mean AT&T Communications of the Southern States, Inc.

2. AT&T objects to Staff's First Set of Interrogatories to the extent that it is overly broad, unduly burdensome, oppressive, not permitted by applicable discovery rules, and would require AT&T to disclose information which is privileged.

3. AT&T has interpreted Staff's requests to apply to AT&T's regulated intrastate operations in Florida and will limit its responses accordingly. To the extent that any request is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission, AT&T objects to such request as irrelevant, overly broad, unduly burdensome, and oppressive.

4. AT&T objects to each and every request and instruction to the extent that such 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.

5. AT&T objects to each and every 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 requests. Any Responses provided by AT&T in response to Staff's requests will be provided subject to, and without waiver of, the foregoing objection.

6. AT&T objects to each and every 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. AT&T will attempt to note each instance where this objection applies.

7. AT&T objects to Staff'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.

8. AT&T objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

9. AT&T objects to each and every request, general instruction, or definition insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

10. AT&T objects to each and every 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 Staff's requests seek proprietary confidential business information which is not the subject of the "trade secrets" privilege, AT&T will make such information available to counsel for Staff pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

11. AT&T is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, AT&T 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 and are frequently moved from site to site as employees change jobs or as the business is reorganized. Rather, these responses will provide all of the information obtained by AT&T after a reasonable and diligent search conducted in connection with this discovery request. AT&T will comply with Staff's request that a search be conducted of those files that are reasonably expected to contain the requested information. To the extent that the discovery request purports to require more, AT&T objects on the grounds that compliance would impose an undue burden or expense.

Objections to Specific Requests

Subject to, and without waiver of, the foregoing general objections, AT&T enters the following specific objections with respect to Staff's requests:

Interrogatory No. 1(a): Without waiver, AT&T intends to provide the requested information in its possession custody or control.

Interrogatory No. 1(b): Without waiver, AT&T intends to provide the requested information in its possession custody or control.

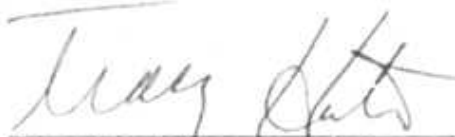
Interrogatory No. 2(a): Without waiver, AT&T intends to provide the requested information in its possession custody or control.

Interrogatory No. 2(b): Without waiver, AT&T intends to provide the requested information in its possession custody or control.

Interrogatory No. 2(c): Without waiver, AT&T intends to provide the requested information in its possession custody or control.

Interrogatory No. 2(d): Without waiver, AT&T intends to provide the requested information in its possession custody or control.

SUBMITTED this 25th day of August, 1998.



Tracy Hatch
101 N. Monroe St.
Suite 700
Tallahassee, FL 32301
(904) 425-6364

ATTORNEY FOR AT&T
COMMUNICATIONS OF THE
SOUTHERN STATES, INC.