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September 21, 1998

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

Dear Mrs. Bayo:

Re: Docket No. 980696-TP

You will find enclosed for filing in the above-referenced docket an original and fifteen (15) copies of AT&T's Objections to BellSouth's First Set of Interrogatories to AT&T; AT&T's Objections to BellSouth's Third Request for Production of Documents to AT&T; AT&T's Objections to Staff's Fourth Request for Production of Documents to AT&T and AT&T's Fourth Set of Interrogatories to AT&T.

Copies of the foregoing are being served on the parties of record in accordance with the attached certificate of service.

Yours truly,

*Tracy Hatch*  
Tracy Hatch

ACK \_\_\_\_\_  
AFA 2  
APP \_\_\_\_\_  
CAF \_\_\_\_\_ JH/mr  
CMU \_\_\_\_\_ Enclosures  
CTR \_\_\_\_\_ cc: Parties of Record

EAG \_\_\_\_\_  
LEG 2  
LIN 5  
OPC \_\_\_\_\_  
RCH \_\_\_\_\_  
SEC 1  
WAS \_\_\_\_\_  
OTH \_\_\_\_\_

4th POD  
DOCUMENT NO.  
10401  
9-21-98

Obj. to BS 1<sup>st</sup> Set  
DOCUMENT NUMBER-DATE  
10398 SEP 21 98  
FPSC RECORDS/REPORTING

BS's 3<sup>rd</sup> POD  
DOCUMENT NUMBER-DATE  
10399 SEP 21 98  
FPSC RECORDS/REPORTING

FPSC's 4<sup>th</sup>  
DOCUMENT NUMBER-DATE  
10400 SEP 21 98  
FPSC RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 980696-TP

DATED: September 21, 1998

AT&T'S OBJECTIONS TO BELLSOUTH 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 1.350 and 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 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 right to supplement, revise, or modify its objections at the time that it serves its Responses on BELLSOUTH. Moreover, should AT&T determine

DOCUMENT NUMBER-DATE  
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FPSC-RECORDS/REPORTING

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 Responses 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 Responses are served on BELLSOUTH.

1. AT&T objects to BELLSOUTH'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.

2. AT&T has interpreted BELLSOUTH'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.

3. 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.

4. 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 BELLSOUTH's requests will be provided subject to, and without waiver of, the foregoing objection.

5. 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.

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 request, 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 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 BELLSOUTH'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 BELLSOUTH pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

10. 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 BELLSOUTH'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 BELLSOUTH's requests:

Interrogatory 1: Without waiver, AT&T will provide the requested information in its possession custody or control subject to a determination of confidentiality by AT&T and the execution of an appropriate protective agreement.

Interrogatory 2: Without waiver, AT&T will provide the requested information in its possession custody or control subject to a determination of confidentiality by AT&T and the execution of an appropriate protective agreement.

Interrogatory No. 3: Without waiver, AT&T will provide the requested information in its possession custody or control subject to a determination of confidentiality by AT&T and the execution of an appropriate protective agreement.

Interrogatory No. 4: Without waiver, AT&T will provide the requested information in its possession custody or control subject to a determination of confidentiality by AT&T and the execution of an appropriate protective agreement.

Interrogatory No. 5: Without waiver, AT&T will provide the requested information in its possession custody or control subject to a determination of confidentiality by AT&T and the execution of an appropriate protective agreement.

Interrogatory No. 6: Without waiver, AT&T will provide the requested information in its possession custody or control subject to a determination of confidentiality by AT&T and the execution of an appropriate protective agreement.

Interrogatory No. 7: Without waiver, AT&T will provide the requested information in its possession custody or control subject to a determination of confidentiality by AT&T and the execution of an appropriate protective agreement.

Interrogatory No. 8: Without waiver, AT&T will provide the requested information in its possession custody or control subject

to a determination of confidentiality by AT&T and the execution of an appropriate protective agreement.

Interrogatory No. 9: Without waiver, AT&T will provide the requested information in its possession custody or control subject to a determination of confidentiality by AT&T and the execution of an appropriate protective agreement.

Interrogatory No. 10: Without waiver, AT&T will provide the requested information in its possession custody or control subject to a determination of confidentiality by AT&T and the execution of an appropriate protective agreement.

Interrogatory No. 11: Without waiver, AT&T will provide the requested information in its possession custody or control subject to a determination of confidentiality by AT&T and the execution of an appropriate protective agreement.

Interrogatory No. 12: Without waiver, AT&T will provide the requested information in its possession custody or control subject to a determination of confidentiality by AT&T and the execution of an appropriate protective agreement.

Interrogatory No. 13: Without waiver, AT&T will provide the requested information in its possession custody or control subject to a determination of confidentiality by AT&T and the execution of an appropriate protective agreement.

SUBMITTED this 21st day of September, 1998.

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



**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 21st day of September, 1998:

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