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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Petition by Intermedia Communications Inc. for Arbitration with BellSouth Telecommunications, Inc., pursuant to the Telecommunications Act of 1996.

DOCKET NO. [REDACTED] RECORDS AND REPORTING

In re: Petition by e.spire Communications, Inc. and American Communication Services of Tampa, Inc., American Communications Services of Jacksonville, Inc. for Arbitration of an Interconnection Agreement with BellSouth Telecommunications, Inc. Pursuant to Section 252(b) of the Telecommunications Act of 1996.

DOCKET NO. 981745-TP FILED: 2-5-99

INTERMEDIA COMMUNICATIONS INC.'S OBJECTIONS TO BELL SOUTH TELECOMMUNICATIONS, INC.'S FIRST SET OF INTERROGATORIES

COMES NOW, Intermedia Communications Inc. (Intermedia), 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 BellSouth Telecommunications, Inc.'s (BellSouth) First Set of Interrogatories to Intermedia.

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revise, or modify its objections at the time that it serves its Answers to BellSouth. Moreover, should Intermedia determine that a Protective Order is necessary with respect to any of the material requested by BellSouth, Intermedia 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

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

1. Intermedia has interpreted BellSouth's interrogatories to apply to Intermedia'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, Intermedia objects to such interrogatory as irrelevant, overly broad, unduly burdensome, and oppressive.

2. Intermedia 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.

3. Intermedia objects to each and every interrogatory insofar as the request is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple

interpretation but are not properly defined or explained for purposes of these interrogatories. Any Answers provided by Intermedia in response to BellSouth's interrogatories will be provided subject to, and without waiver of, the foregoing objection.

4. Intermedia 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. Intermedia will attempt to note each instance where this objection applies.

5. Intermedia objects to BellSouth's discovery requests insofar as they seek to impose obligations on Intermedia which exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

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

7. Intermedia objects to each and every interrogatory, insofar as it calls for a response which is unduly burdensome, expensive, oppressive, or excessively time consuming as written to prepare.

8. Intermedia 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, Intermedia 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.

OBJECTIONS TO SPECIFIC INTERROGATORIES

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

INTERROGATORY NO. 4: Pursuant to the General Objections stated above, Intermedia objects to this interrogatory on the grounds and to the extent that it seeks information that is exempt from discovery by virtue of the attorney-client privilege and work product privilege.

INTERROGATORY NO. 58: Pursuant to the General Objections stated above, Intermedia objects to this interrogatory on the grounds and to the extent that it seeks information amounting to "trade secrets" that are privileged under Section 90.506, Florida Statutes. Intermedia also objects to this interrogatory on the grounds and to the extent that it seeks information amounting to proprietary confidential business information that is not subject to the "trade secrets" privilege.

Respectfully submitted this 5th day of February, 1999.

INTERMEDIA COMMUNICATIONS INC.

By:

Charles Pellegrini

Patrick K. Wiggins
Charles J. Pellegrini
WIGGINS & VILLACORTA, P.A.
2145 Delta Boulevard
Suite 200
Post Office Drawer 1657
Tallahassee, Florida 32302
(850) 385-6007
(850) 385-6008 (facsimile)

Attorneys for Intermedia
Communications Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail or hand delivery (*) this 5th day of February, 1999, to the following:

Ms. Nancy White*
c/o Ms. Nancy H. Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street
Suite 400
Tallahassee, FL 32301-1556

June McKinney/Will Cox
Division of Legal Services
Florida Public Service
Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Norman H. Horton, Jr.
Messer, Caparello & Self, P.A.
215 South Monroe Street
Suite 701
P.O. Box 1876
Tallahassee, FL 32302-1876

Scott A. Sapperstein
Intermedia Communications Inc.
3625 Queen Palm Drive
Tampa, FL 33619


Patrick Knight Wiggins