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Legal Department

Michael P. Goggin
General Attorney

99 MAR 22 PM 4: 33

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5561

RECORDS AND
REPORTING

March 22, 1999

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. 980947-TL
Waiver for Boca Raton/Boca Teeca Central Office

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunication's Inc.'s Objections to Intermedia's First Set of Interrogatories, 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.

- ACK _____
- AFA 5
- APP _____
- CAF _____
- CMU 1
- CTR _____
- EAG _____
- LEG 1 Enclosures
- LIN 5
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH Place in 980946 only

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-- Sincerely,

Michael P. Goggin

Michael P. Goggin (BW)

DOCUMENT NUMBER-DATE

03692 MAR 22 99

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket Nos. 980947-TL, 980948-TL, 981011-TL, 981012-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U.S. Mail this 22nd day of March, 1999 to the following:

Beth Keating, Esq.
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Donna L. Canzano
Patrick Knight Wiggins
Wiggins & Villacorta, P.A.
2145 Delta Boulevard
Suite 200
P.O. Drawer 1657
Tallahassee, FL 32302
Tel. No. (850) 385-6007
Fax. No. (850) 385-6008

Steve Brown
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619-1309
Tel. No. (813) 829-0011
Fax. No. (813) 829-4923

Floyd R. Self, Esq.
Messer, Caparello & Self, P.A.
215 South Monroe Street
Suite 701
Tallahassee, FL 32301-1876
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359

Mr. Brian Sulmonetti
WorldCom Technologies, Inc.
1515 South Federal Highway
Suite 400
Boca Raton, FL 33432
Tel. No. (561) 750-2940
Fax. No. (561) 750-2629

David V. Dimlich, Esq.
Legal Counsel
Supra Telecommunications &
Information Systems, Inc.
2620 S.W. 27th Avenue
Miami, FL 33133
Tel. No. (305) 476-4235
Fax. No. (305) 443-1078

Amanda Grant
BellSouth Telecommunications, Inc.
Regulatory & External Affairs
675 West Peachtree Street, N.E.
Room 38L64
Atlanta, Georgia 30375

Norman H. Horton, Jr.
Messer, Caparello & Self, P.A.
215 S. Monroe Street
Suite 701
Tallahassee, Florida 32301-1876
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Represents e.spire»

James C. Falvey, Esq.
e.spire» Communications, Inc.
133 National Business Parkway
Suite 200
Annapolis Junction, Maryland 20701
Tel. No. (301) 361-4298
Fax. No. (301) 361-4277

Kenneth A. Hoffman, Esq.
John R. Ellis, Esq.
Rutledge, Eceria, Underwood,
Purnell & Hoffman, P.A.
P.O. Box 551
Tallahassee, FL 32301
Tel. No. (850) 681-6788
Fax. No. (850) 681-6515

Steven Gorosh
Vice President and General Counsel
NorthPoint Communications, Inc.
222 Sutter Street, 7th Floor
San Francisco, CA 94108
Tel. No. (415) 659-6518
Fax. No. (415) 658-4190

Charles A. Hudak, Esq.
Jeremy D. Marcus, Esq.
Gerry, Friend & Sapronov, LLP
Three Ravinia Drive, Suite 1450
Atlanta, GA 30346-2131
Tel. No. (770) 399-9500
Fax. No. (770) 395-0000
Attys. for ACI Corp.

Jeffrey Blumenfeld, Esq.
Elise P.W. Kiely, Esq.
Blumenfeld & Cohen
1615 M Street, NW
Suite 700
Washington, DC 20036
Tel. No. (202) 955-6300
Fax. No. (202) 955-6460
Attys. for ACI Corp.

Peter M. Dunbar, Esq.
Barbara D. Auger, Esq.
Pennington, Moore, Wilkinson
& Dunbar, P.A.
Post Office Box 10095
Tallahassee, FL 32302-2095
Tel. (850) 222-3533
FAx (850) 222-2126
Attys for Time Warner Telecom

Carolyn Marek
VP of Reg. Affairs
Time Warner Communications
233 Bramerton Court
Franklin, TN 37069
Tel. (615) 376-6404
Fax (615) 376-6405

Monica M. Barone
Sprint Communications Company
Limited Partnership
3100 Cumberland Circle
Mailstop GAATLN0802
Atlanta, GA 30339

James D. Earl, Esq.
Covad Communications, Inc. d/b/a
DIECA Communications
6849 Old Dominion Drive
Suite 220
McLean, VA 22101
Tel: (703) 734-6221
Fax: (703) 734-5474

Richard D. Melson
Gabriel E. Nieto
Hopping Green Sams & Smith
Post Office Box 6526
Tallahassee, FL 32314
Attys. for ACI Corp.

Peter M. Dunbar, Esq.
Barbara D. Auger, Esq.
Pennington, Moore, Wilkinson,
& Dunbar, P.A.
Post Office Box 10095
Tallahassee, FL 32302
Tel.: (850) 222-3533
Fax: (850) 222-2126
Attys for Time Warner

Carolyn Marek
Time Warner Communications
233 Bramerton Court
Franklin TN 37069
Tel.: (615) 376-6404
Fax: (615) 376-6405


Michael P. Goggin (PM)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Waiver of Physical) Docket No.: 980947-TL
 Collocation Requirements Set Forth)
 In the Telecommunications Act of 1996)
 And the FCC's First Report and Order,)
 for the Boca Raton Boca Teeca Central)
 Office, By BellSouth Telecommunications, Inc.)
 _____) Filed: March 22, 1999

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
 OBJECTIONS TO INTERMEDIA'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, the following Objections to Intermedia Communication Inc.'s ("Intermedia's") First Set of Interrogatories to BellSouth Telecommunications Inc.

The objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the 10-day requirement set forth in the procedural order issued by the Florida Public Service Commission ("Commission") in the above-captioned docket. Should additional grounds for objection be discovered as BellSouth prepares its answers to the above-referenced interrogatories, BellSouth reserves the right to supplement, revise, or modify its objections at the time it serves its answers. Moreover, should BellSouth determine that a Protective Order is necessary with respect to any of the requested information, BellSouth reserves the right to file a motion with the Commission seeking such an order at the time that it serves its answers.

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GENERAL OBJECTIONS

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

1. BellSouth objects to the interrogatories to the extent they 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 objects to the interrogatories to the extent they are intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission. BellSouth objects to such interrogatories as being 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 interrogatory 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 or interrogatories. Any answers provided by BellSouth in response to these interrogatories will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth objects to each and every interrogatory insofar as the interrogatory 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 providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

7. BellSouth 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 Intermedia requests proprietary confidential business information which is not subject to the "trade secrets" privilege, BellSouth will make such information available to counsel for Intermedia pursuant to a Notice of Intent to Request Confidential Treatment and subject to any other general or specific objections contained herein.

8. BellSouth objects to Intermedia'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.

9. BellSouth objects to each and every Interrogatory, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

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 identified in response to these interrogatories. Rather, these responses provide all of the information obtained by BellSouth after a reasonable and diligent search conducted in connection with these interrogatories. BellSouth has complied with Intermedia's request that a search be conducted of those files that are reasonably expected to contain the requested information. To the extent the interrogatories purport to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

SPECIFIC OBJECTIONS TO INTERROGATORIES

BellSouth provides the following objections to Intermedia's First Set of Interrogatories.

1. BellSouth objects to Interrogatory 2 to the extent that it calls for the disclosure of customer proprietary information contrary to the requirements of § 364.24(2), Fla. Stat. and, to the extent that it calls for information regarding virtual collocation, as not relevant to the subject matter of this docket and not reasonably calculated to lead to the discovery of admissible evidence.
2. BellSouth objects to Interrogatory 9 Part (a) to the extent that it defines "obsolescent" as "not used."

3. BellSouth objects to Interrogatories 11 and 18 to the extent that each calls for information regarding the terms upon which BellSouth will offer virtual collocation as not relevant to the subject matter of this docket and not reasonably calculated to lead to the discovery of admissible evidence.

4. BellSouth objects to Interrogatories 15 and 17 as vague and ambiguous.

5. BellSouth objects to Interrogatory 20 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

For these reasons, BellSouth objects to the foregoing interrogatories.

Respectfully submitted this 22nd day of March, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

NANCY B. WHITE (Pw)
MICHAEL P. GOGGIN

c/o Nancy Sims
150 South Monroe Street, #400
Tallahassee, Florida 32301
(305)347-5555

William J. Ellenberg II

WILLIAM J. ELLENBERG II (Pw)
J. PHILLIP CARVER

675 West Peachtree Street, #4300
Atlanta, Georgia 30375
(404)335-0711