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General Attorney

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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. 981011-TL** ⁹⁸⁰⁹⁹⁶
Waiver for the West Palm Beach Gardens 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 Favors
- CTR _____
- EAG _____
- LEG 1
- LIN 5
- DPC _____
- RCH _____
- SEC 1
- VAS _____
- OTH _____

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FPSC-BUREAU OF RECORDS

Sincerely,

Michael P. Goggin
Michael P. Goggin

Enclosures

cc: All parties of record
Nancy B. White
A. M. Lombardo
William J. Ellenberg II

DOCUMENT NUMBER-DATE

03697 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:

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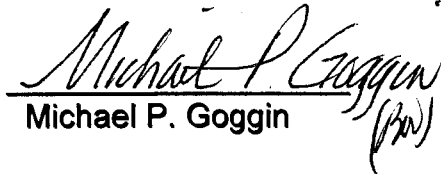
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Michael P. Goggin

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Waiver of Physical) Docket No.: 981011-TL
 Collocation Requirements Set Forth)
 In the Telecommunications Act of 1996)
 And the FCC's First Report and Order,)
 For the West Palm Beach Gardens)
 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.

DOCUMENT NUMBER-DATE

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FOSC-RECORDS/REPORTING

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.

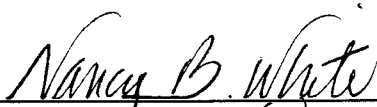
4. BellSouth objects to Interrogatories 15 and 17 as vague and ambiguous.

5. BellSouth objects to Interrogatory 19 as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

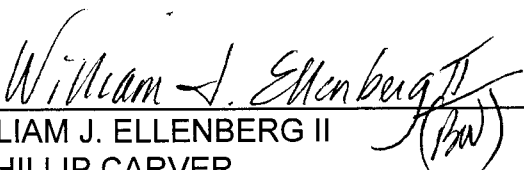
For these reasons, BellSouth objects to the foregoing interrogatories.

Respectfully submitted this 22nd day of March, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.



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