

MICHEAL P. GOGGIN
General Attorney

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

ORIGINAL

RECORDS AND
REPORTING

99 OCT 21 PM 4:28

RECEIVED - FPSC

October 21, 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. 990455-TL

Dear Ms. Bayó:

Enclosed please find an original and fifteen copies of BellSouth Telecommunications, Inc.'s Objections to Staff's First Set of Interrogatories (Nos. 1-13) served on October 11, 1999, which we ask that you file in the above-referenced 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.

Sincerely,

Michael P. Goggin (KR)
Michael P. Goggin

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Nancy B. White

170892

- AFA _____
- APP _____
- CAF _____
- CMU *Alteri*
- CTR _____
- EAG _____
- LEG *2*
- MAS *3*
- OPC _____
- PAI _____
- SEC *1*
- WAW _____
- WTH _____

RECEIVED & FILED

Max
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

12952 OCT 21 99

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for review of) DOCKET NO. 990455-TL
Proposed numbering plan relief)
For the 305/786 area code – Dade)
County and Monroe County/Keys)
Region.) FILED: OCTOBER 21, 1999

**BELLSOUTH TELECOMMUNICATIONS, INC.'S OBJECTIONS TO
STAFF'S FIRST SET OF INTERROGATORIES**

BellSouth Telecommunications, Inc., ("BellSouth") pursuant to Rule 28-106.206, *Florida Administrative Code*, and Rules 1.340 and 1.280, *Florida Rules of Civil Procedure*, files the following general objections to the First Set of Interrogatories served by the Staff of the Florida Public Service Commission's ("Staff") on October 11, 1999.

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

12952 OCT 21 89

FPSC-RECORDS/REPORTING

GENERAL OBJECTIONS

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 request is 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 such interrogatory. 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 in its responses 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 Commission.

7. BellSouth objects to each and every interrogatory to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to §90.506, *Florida Statutes*. BellSouth also objects to each and every interrogatory that would require the disclosure of customer specific information, the disclosure of which is prohibited by §364.24, *Florida Statutes*. To the extent that Staff requests proprietary information that is not subject to the "trade secrets" privilege or to §364.24, BellSouth will make such information available to Staff at a mutually agreeable time and place upon the execution of a confidentiality agreement, or subject to a Request for Confidential Classification.

8. BellSouth objects to Staff's interrogatories, 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 any of them 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 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. BellSouth will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the interrogatories purport to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

Respectfully submitted this 21st day of October, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White (KR)
NANCY B. WHITE
MICHAEL P. GOGGIN
c/o Nancy H. Sims
150 So. Monroe Street, Suite 400
Tallahassee, FL 32301
(305) 347-5558

R. Douglas Lackey (KR)
R. DOUGLAS LACKEY
Suite 4300
675 W. Peachtree St., NE
Atlanta, GA 30375
(404) 335-0747

183232

**CERTIFICATE OF SERVICE
Docket No. 990455-TL**

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

U.S. Mail this 21st day of October, 1999 to the following:

William Cox
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
Tel. (850) 413-6204
Fax. (850) 413-6250

Angela Green, General Counsel
Florida Public Telecommunications
Association
125 South Gadsden Street
Suite 200
Tallahassee, FL 32301-1525
Tel. No. (850) 222-5050
Fax No. (850) 222-1355

D. Bruce May, Jr.
Holland & Knight LLP
Post Office Drawer 810
Tallahassee, FL 32302-0810
Tel. No. (850) 224-7000
Fax No. (850) 222-8185
Represents BellSouth Mobility

D. Wayne Milby
Lockheed Martin IMS
Communications Industry Services
1133 15th Street, N.W.
Washington, DC 20005
Tel. No. (202) 756-5600

Kenneth Hoffman
Rutledge Law Firm
Post Office Box 551
Tallahassee, FL 32302
Tel. No. (850) 681-6788
Fax No. (850) 681-6515
Attys. for Omnipoint Communications

Charles J. Rehwinkel
Susan Masterton
Sprint-Florida, Inc.
P.O. Box 2214
Tallahassee, FL 32399-2214
MC FLTLHO0107
Tel. No. (850) 847-0244

Joe Assenzo
Sprint PCS
Legal Department
49000 Main Street, 11th Floor
Kansas City, Missouri 64112
Tel. No. (816) 559-1000

Floyd R. Self
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

Tracy Hatch
Marsha Rule
AT&T Communications of the
Southern States, Inc.
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
Tel. No. (850) 425-6364
Fax. No. (850) 425-6361

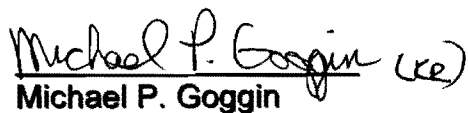
Gloria Johnson
General Attorney
BellSouth Cellular Corp.
1100 Peachtree Street, N.E.
Suite 910
Atlanta, Georgia 30309-4599

Kimberly Caswell
GTE Florida, Inc.
Post Office Box 110, FLTC0007
Tampa, Florida 33601-0110
Tel. No. (813) 483-2617

Donna Canzano McNulty
MCI WorldCom, Inc.
325 John Knox Road
The Atrium, Suite 105
Tallahassee, Florida 32303
Tel. No. (850) 422-1254
Fax No. (850) 422-2586

Brian Sulmonetti
MCI WorldCom, Inc.
6 Concourse Parkway, Suite 3200
Atlanta, Georgia 30328
Tel. No. (770) 284-5493
Fax No. (770) 284-5488

Michael A. Gross
Vice President
Fla. Cable Telecomm. Assn., Inc.
310 North Monroe Street
Tallahassee, Florida 32301
Tel. No. (850) 681-1990
Fax No. (850) 681-9676
E-Mail Address: mgross@fcta.com


Michael P. Goggin