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ORIGINAL

February 14, 2000

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RECORDS AND REPORTING

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

Re: Docket No. 991237-TP

Dear Mrs. Bayo:

Enclosed for filing in the above-referenced docket are an original and fifteen (15) copies of AT&T Communications of the Southern States, Inc.'s Objections to BellSouth's First Set of Interrogatories and Objections to BellSouth's First Request for Production of Documents.

Copies of the foregoing are being served on all parties of record in accordance with the attached Certificate of Service.

Thank you for your assistance with this matter.

Yours truly,

Tracy Hatch

TH:kfj  
Enclosures

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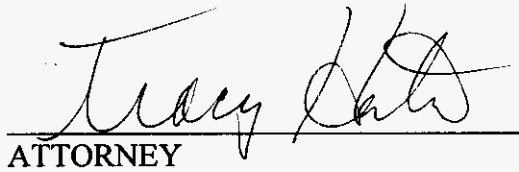


**CERTIFICATE OF SERVICE**  
**DOCKET NO. 991237-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished  
via U.S. Mail to the following parties of record on this 14<sup>th</sup> day of February, 2000:

Nancy B. White  
c/o Nancy Sims  
BellSouth Telecommunications, Inc.  
150 S. Monroe Street, Suite 400  
Tallahassee, FL 32301-1556

Diana Caldwell  
FPSC  
2540 Shumard Oak Blvd.  
Room 301D  
Tallahassee, FL 32399-0850

  
\_\_\_\_\_  
ATTORNEY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint by AT&T Communications      DOCKET NO. 991237-TP  
of the Southern States Against BellSouth  
Telecommunications, Inc. regarding Improper      DATED: February 14, 2000  
Application of Switched Access Charges

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ORIGINAL

**AT&T'S OBJECTIONS TO BELLSOUTH'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 1.340 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-99-2456-PCO-TP issued by the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced docket on December 16, 1999. Should additional grounds for objection be discovered as AT&T prepares its Answers to the above-referenced set of interrogatories, AT&T reserves the right to supplement, revise, or modify its objections at the time that it serves its Answers on BELLSOUTH. Moreover, should AT&T determine 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 Answers on BELLSOUTH.**

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## 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 Answers are served on BELLSOUTH.

1. AT&T objects to the following provisions of the "Definitions" section of BELLSOUTH's First Set of Interrogatories:

Paragraph (a): AT&T objects to the definitions of "AT&T" to the extent that such definitions seek to impose an obligation on AT&T Communications of the Southern States, Inc. to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such definition is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. Without waiver of its general objection, and subject to other general and specific objections, Answers will be provided on behalf of AT&T Communications of the Southern States, Inc. which is the entity certificated to provide regulated telecommunications services in Florida and which is a party to this docket. All references to "AT&T" in responding to BELLSOUTH's interrogatories should be taken to mean AT&T Communications of the Southern States, Inc.

2. Unless otherwise indicated, AT&T has interpreted BELLSOUTH's interrogatories to apply to AT&T'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, AT&T objects to such interrogatory as irrelevant, overly broad, unduly burdensome, and oppressive.

3. AT&T 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. AT&T objects to each and every interrogatory 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 interrogatories. Any Answers provided by AT&T in response to BELLSOUTH's interrogatories will be provided subject to, and without waiver of, the foregoing objection.

5. AT&T 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. 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 interrogatory, 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 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, 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.

Objections to Specific Interrogatories

Subject to, and without waiver of, the foregoing general objections, AT&T enters the following specific objections with respect to BELLSOUTH's interrogatories:

**INTERROGATORY NO. 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 NO. 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.

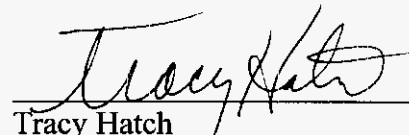
**INTERROGATORY NO. 5:** Without waiver, AT&T will provide the requested information in its possession custody or control subject to a determination of confidentiality by AT&T and the execution of an appropriate protective agreement.

**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.

SUBMITTED this 14<sup>th</sup> day of February, 2000.

  
Tracy Hatch  
101 N. Monroe St.  
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(850) 425-6364

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