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March 23, 2000

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 Staff's First Set of Interrogatories and Objections to Staff'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

- AFA _____
- APP _____
- CAF _____
- SMW 3 *Albela*
- CTR _____
- EAG _____
- LEG 1
- MAS 3
- OPC _____
- RRR _____
- SEC 1
- TW _____
- WH _____

TH:kfj
Enclosures

man

DOCUMENT NUMBER-DATE

03680 MAR 23 8

PPS&C-RECORDS/REPORTING



CERTIFICATE OF SERVICE
DOCKET NO. 991237-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished
via hand delivery to the following parties of record on this 23rd day of March, 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 Staff
Telecommunications, Inc. regarding Improper DATED: March 23, 2000
Application of Switched Access Charges

**AT&T'S OBJECTIONS TO STAFF'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 the Staff of the Florida Public Service Commission's (hereinafter "Staff") 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 ten-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 STAFF. Moreover, should AT&T determine that a Protective Order is necessary with respect to any of the material requested by STAFF, 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 STAFF.

DOCUMENT NUMBER-DATE

03680 MAR 23 8

FPSO-RECORDS/REPORTING

General Objections

AT&T makes the following General Objections to STAFF's First Set of Interrogatories which will be incorporated by reference into AT&T's specific responses when its Answers are served on STAFF.

1. AT&T objects to the following provisions of the "Definitions" section of STAFF'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 STAFF's interrogatories should be taken to mean AT&T Communications of the Southern States, Inc.

2. Unless otherwise indicated, AT&T has interpreted STAFF'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 STAFF'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 STAFF'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 STAFF'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 STAFF 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 STAFF'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.

SUBMITTED this 23^d day of March, 2000.

A handwritten signature in cursive script that reads "Tracy Hatch". The signature is written in black ink and is positioned above a horizontal line.

Tracy Hatch
101 N. Monroe St.
Suite 700
Tallahassee, FL 32301
(850) 425-6364

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint by AT&T Communications DOCKET NO. 991237-TP
of the Southern States Against Staff
Telecommunications, Inc. regarding Improper DATED: March 23, 2000
Application of Switched Access Charges

**AT&T'S OBJECTIONS TO THE STAFF OF THE
FLORIDA PUBLIC SERVICE COMMISSION'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

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 1.350 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following Objections to the Staff of the Florida Public Service Commission's (hereinafter "STAFF") First Request for Production of Documents 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 ten-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 Responses to the above-referenced set of requests, AT&T reserves the right to supplement, revise, or modify its objections at the time that it serves its Responses on STAFF. Moreover, should AT&T determine that a Protective Order is necessary with respect to any of the material requested by STAFF, AT&T reserves the right to file a motion with the Commission seeking such an order at the time that it serves its Responses on STAFF.

General Objections

AT&T makes the following General Objections to STAFF's First Set of Requests for Production of Documents which will be incorporated by reference into AT&T's specific responses when its Responses are served on STAFF.

1. AT&T objects to STAFF's First Set of Requests for Production of Documents to the extent that it is overly broad, unduly burdensome, oppressive, not permitted by applicable discovery rules, and would require AT&T to disclose information which is privileged.

2. AT&T has interpreted STAFF's requests to apply to AT&T's regulated intrastate operations in Florida and will limit its Responses accordingly. To the extent that any request is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission, AT&T objects to such request as irrelevant, overly broad, unduly burdensome, and oppressive.

3. AT&T objects to each and every request and instruction to the extent that such request 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 request 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 requests. Any Responses provided by AT&T in response to STAFF's requests will be provided subject to, and without waiver of, the foregoing objection.

5. AT&T objects to each and every request 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 STAFF'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 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.

8. AT&T objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

9. AT&T objects to each and every request, general instruction, or definition insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

10. AT&T objects to each and every request to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that STAFF's requests seek proprietary confidential business information which is not the subject of the "trade secrets" privilege, AT&T will make such information available to counsel for STAFF pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

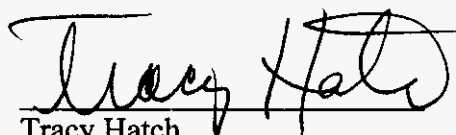
11. AT&T is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, AT&T creates countless documents that are not subject to Florida Public Service Commission or FCC retention of records requirements. These documents are kept in numerous locations and are frequently moved from site to site as employees change jobs or as the business is reorganized. Rather, these responses will provide all of the

information obtained by AT&T after a reasonable and diligent search conducted in connection with this discovery request. AT&T will comply with STAFF's request that a search be conducted of those files that are reasonably expected to contain the requested information. To the extent that the discovery request purports to require more, AT&T objects on the grounds that compliance would impose an undue burden or expense.

Specific Objections:

Document Requests 1 – 6: Subject to and without waiver of the above, AT&T will provide the requested documents 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 23^d day of March, 2000.



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Tallahassee, FL 32301
(850) 425-6364

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