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RECORDS AND  
REPORTING

April 17, 2000

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

Re: Docket Nos. 990455-TL, 990456-TL, 990457-TL and (990517-TL)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s General and Specific Objections to Staff's Second Set of Interrogatories (Nos. 7-32) and its First Request for Production of Docs. (Nos. 1-2), which we ask that you file in the captioned dockets.

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*  
Michael P. Goggin

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

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APP \_\_\_\_\_  
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FPSC-RECORDS/REPORTING

**ORIGINAL**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Request for review of proposed )  
numbering plan relief for the 904 area )  
code )  
\_\_\_\_\_ )

Docket No. 990517-TL

Filed: April 17, 2000

**BELLSOUTH TELECOMMUNICATIONS, INC.'S GENERAL AND SPECIFIC  
OBJECTIONS TO STAFF'S SECOND SET OF INTERROGATORIES (Nos. 7 - 32)  
AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (Nos. 1 - 2)**

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 and specific objections to the Second Set of Interrogatories (Nos. 7-32) and First Request For Production of Documents (Nos. 1-2) served by the Staff of the Florida Public Service Commission ("Staff") on April 6, 2000.

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.

**GENERAL OBJECTIONS**

1. BellSouth objects to the interrogatories and request for production of documents 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 and request for production of documents 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 and request for production of documents as being irrelevant, overly broad, unduly burdensome, and oppressive.

3. BellSouth objects to each and every interrogatory, request for production of documents, and instruction to the extent that such interrogatory, request for production of documents, 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 and request for production of documents insofar as the interrogatory and request for production of documents are 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 and request for production of documents. Any answers provided by BellSouth in response to these interrogatories and request for production of documents will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth objects to each and every interrogatory and request for production of documents insofar as the interrogatory and request for production of documents are 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 and request for production of documents 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 and request for production of documents 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 and request for production of documents, 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 and request for production of documents 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 and request for production of documents. BellSouth will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the interrogatories and request for production of documents purport to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

#### **SPECIFIC OBJECTIONS**

BellSouth enters the following specific objections with respect to Staff's requests:

**Interrogatory No. 22: Please identify and explain each type of OSS upgrade or modification that is needed to implement thousand-block number pooling in the 904 area code.**

**Specific Objection: With respect to Interrogatory No. 22, BellSouth objects to this request on the grounds that the information requested will contain strategic business**

information and cost data, as well as vendor-specific contractual information (although it is likely that we will not have this information available in time to file our responses because we're waiting on the information from our vendors).

**Interrogatory No. 23: Of the enumerated OSS upgrades and modifications identified in response to Interrogatory 22, which ones are included in BellSouth's thousand-block number pooling implementation cost estimate?**

**Specific Objection:** With respect to Interrogatory No. 23, BellSouth objects to this request on the grounds that the information requested will contain strategic business information and cost data, as well as vendor-specific contractual information (although it is likely that we will not have this information available in time to file our responses because we're waiting on the information from our vendors).

**Production of Documents No. 1: Please provide the supporting workpapers for the cost assumptions used to arrive at the \$368,808 discussed in Interrogatory 18.**

**Specific Objection:** With respect to Interrogatory No. 18, BellSouth objects to this request on the grounds that the information requested will contain strategic business information.

Respectfully submitted this 17<sup>th</sup> day of April, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Nancy B. White*

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**CERTIFICATE OF SERVICE**  
**Docket Nos. 990455-TL, 990456-TL, 990457-TL and (990517-TL)**

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

(\*) Hand Delivery and U.S. Mail this 17<sup>th</sup> day of April, 2000 to the following:

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