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RECORDS AND
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June 28, 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. 990649-TP

Dear Mrs. Bayo:

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

Sincerely,

Marsha Rule
Marsha Rule

- APP _____
- CAF _____
- CMP *Oltha*
- COM 5
- CTR _____
- ECR _____
- LEG 2
- OPC _____
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- RGO _____
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CERTIFICATE OF SERVICE
DOCKET 990649-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via hand delivery*/U.S. Mail to the following parties of record on this 28th day of June, 2000:

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A handwritten signature in black ink, appearing to read "W. Rule", is written above a horizontal line.

Attorney

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of)
unbundled network elements)
_____)

Docket No. 990649-TP

Filed June 28, 2000

AT&T'S OBJECTIONS TO BELL SOUTH TELECOMMUNICATIONS, INC.'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-00-2015-PCO-TP issued by the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced docket on June 8, 2000. 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.

DOCUMENT NUMBER-DATE

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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:

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 interexchange carrier (hereinafter "IXC") 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:

2. Does AT&T provide telephone exchange service in the State of Florida?

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding this objection, AT&T will respond to this interrogatory at the appropriate time.

3. If the answer to the foregoing Interrogatory is in the affirmative, please identify all counties in Florida where AT&T currently provides telephone exchange service, state the date when AT&T began providing such service, and describe with particularity the network AT&T uses to provide such service in Florida.

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

4. Does AT&T own or operate any switches that it uses to provide telephone exchange service in the State of Florida?

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding this objection, AT&T will respond to this interrogatory at the appropriate time.

5. If the answer to the foregoing Interrogatory is in the affirmative, for each switch owned or operated by AT&T to provide telephone exchange service in the State of Florida, please:

- (a) identify the location of each such switch;
- (b) describe the type of switch (e.g., Digital Electronic, ATM);
- (c) state the date when the switch was placed; and
- (d) state the planned retirement date of each such switch

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

6. If the answer to Interrogatory number 4 is in the affirmative, please provide the total investment of switches (by type of switch, if available) that AT&T owns or operates to provide telephone exchange service in the State of Florida.

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

7. Please state the economic lives or useful lives used by AT&T for depreciation purposes for the switches it owns or operates to provide telephone exchange service in Florida, including the extent to which such lives vary depending upon the type of switch involved (e.g., Digital Electronic, ATM, etc.). In answering this Interrogatory, please identify all documents referring or relating to the economic lives or useful lives used by AT&T for depreciation purposes for the switches it owns or operates to provide telephone exchange service in Florida.

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

8. Does AT&T own or operate any cable that it uses to provide telephone exchange service in the State of Florida?

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

9. If the answer to the foregoing Interrogatory is in the affirmative, please:

(a) state the cable route miles currently in place;

- (b) describe the type of cable in place (e.g., Fiber Cable, Metallic Cable, Coaxial Cable, Hybrid Fiber/Coaxial Cable, etc.);
- (c) provide the total investment in cable (by type of cable, if available) that AT&T owns or operates to provide telephone exchange service in the State of Florida.

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

10. Please state the economic lives or useful lives used by AT&T for depreciation purposes for the cable it owns or operates to provide telephone exchange service in Florida, including the extent to which such lives vary depending upon the type of cable involved (e.g., Fiber Cable, Metallic Cable, Coaxial Cable, Hybrid Fiber/Coaxial Cable, etc.). In answering this Interrogatory, please identify all documents referring or relating to the economic lives or useful lives used by AT&T for depreciation purposes for the cable it owns or operates to provide telephone exchange service in Florida.

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

11. Does AT&T own or operate any digital circuit equipment that it uses to provide telephone exchange service in the State of Florida?

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding this objection, AT&T will respond to this interrogatory at the appropriate time.

12. If the answer to the foregoing Interrogatory is in the affirmative, please:
 - (a) describe the type of digital circuit equipment in place (e.g., carrier, optical, amplification, signaling);
 - (b) provide the total investment in digital circuit equipment (by type of equipment, if available) that AT&T owns or operates to provide telephone exchange service in the State of Florida.

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

13. Please state the economic lives or useful lives used by AT&T for depreciation purposes for the digital circuit equipment it owns or operates to provide telephone exchange service in Florida, including the extent to which such lives vary depending upon the type of digital circuit equipment involved (e.g., carrier, optical, amplification, signaling). In answering this Interrogatory, please identify all documents referring or relating to the economic lives or useful lives used by AT&T for depreciation purposes for the digital circuit equipment it owns or operates to provide telephone exchange service in Florida.

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

14. Does AT&T provide interLATA service in the State of Florida?

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding this objection, AT&T will respond to this interrogatory at the appropriate time.

15. If the answer to the foregoing Interrogatory is in the affirmative, please identify all counties in Florida where AT&T currently provides interLATA service, state the date when AT&T began providing such service, and describe with particularity the network AT&T uses to provide such service in Florida.

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

16. Does AT&T own or operate any switches that it uses to provide interLATA service in the State of Florida?

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to

the discovery of admissible evidence. Notwithstanding this objection, AT&T will respond to this interrogatory at the appropriate time.

17. If the answer to the foregoing Interrogatory is in the affirmative, for each switch owned or operated by AT&T to provide interLATA service in the State of Florida, please:

- (a) identify the location of each such switch;
- (b) describe the type of switch (e.g., Digital Electronic, ATM);
- (c) state the date when the switch was placed; and
- (d) state the planned retirement date of each such switch

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

18. If the answer to Interrogatory number 16 is in the affirmative, please provide the total investment of switches (by type of switch, if available) that AT&T owns or operates to provide interLATA service in the State of Florida.

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

19. Please state the economic lives or useful lives used by AT&T for depreciation purposes for the switches it owns or operates to provide interLATA service in Florida, including the extent to which such lives vary depending upon the type of switch involved (e.g., Digital Electronic,

ATM, etc.). In answering this Interrogatory, please identify all documents referring or relating to the economic lives or useful lives used by AT&T for depreciation purposes for the switches it owns or operates to provide interLATA service in Florida.

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

20. Does AT&T own or operate any cable that it uses to provide interLATA service in the State of Florida?

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding this objection, AT&T will respond to this interrogatory at the appropriate time.

21. If the answer to the foregoing Interrogatory is in the affirmative, please:

- (a) state the cable route miles currently in place;
- (b) describe the type of cable in place (e.g., Fiber Cable, Metallic Cable, Coaxial Cable, Hybrid Fiber/Coaxial Cable, etc.);
- (c) provide the total investment in cable (by type of cable, if available) that AT&T owns or operates to provide interLATA service in the State of Florida.

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

22. Please state the economic lives or useful lives used by AT&T for depreciation purposes for the cable it owns or operates to provide interLATA service in Florida, including the extent to which such lives vary depending upon the type of cable involved (e.g., Fiber Cable, Metallic Cable, Coaxial Cable, Hybrid Fiber/Coaxial Cable, etc.). In answering this Interrogatory, please identify all documents referring or relating to the economic lives or useful lives used by AT&T for depreciation purposes for the cable it owns or operates to provide interLATA service in Florida.

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

23. Does AT&T own or operate any digital circuit equipment that it uses to provide interLATA service in the State of Florida?

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding this objection, AT&T will respond to this interrogatory at the appropriate time.

24. If the answer to the foregoing Interrogatory is in the affirmative, please:

- (a) describe the type of digital circuit equipment in place (e.g., carrier, optical, amplification, signaling);

- (b) provide the total investment in digital circuit equipment (by type of equipment, if available) that AT&T owns or operates to provide interLATA service in the State of Florida.

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

25. Please state the economic lives or useful lives used by AT&T for depreciation purposes for the digital circuit equipment it owns or operates to provide interLATA service in Florida, including the extent to which such lives vary depending upon the type of digital circuit equipment involved. In answering this Interrogatory, please identify all documents referring or relating to the economic lives or useful lives used by AT&T for depreciation purposes for the digital circuit equipment it owns or operates to provide interLATA service in Florida.

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

26. Does AT&T currently offer or plan to offer fixed wireless service to provide telephone exchange service or interLATA service in Florida?

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

27. If the answer to the foregoing Interrogatory is in the affirmative, please provide the economic lives or useful lives of the fixed wireless equipment (based on the classification of plant in AT&T's accounting records) which AT&T uses or expects to use to provide such service in Florida. In answering this Interrogatory, please identify all documents referring or relating to such economic lives or useful lives.

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

28. If the answer to Interrogatory No. 26 is in the affirmative, describe with particularity the rates, terms, conditions, nature, and purpose of the fixed wireless service that AT&T offers or plans to offer to provide telephone exchange service or interLATA service in Florida. In answering this Interrogatory, state whether AT&T intends for its fixed wireless service to be used to bypass BellSouth's network and identify all documents referring or relating to any such intention.

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

29. Does AT&T currently provide or plan to provide telephone exchange service or interLATA service in Florida using cable television plant or equipment?

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

30. If the answer to the foregoing Interrogatory is in the affirmative, please provide the economic lives or useful lives of the cable television plant or equipment (based on the classification of plant in AT&T's accounting records) which AT&T uses or expects to use to provide such service in Florida. In answering this Interrogatory, please identify all documents referring or relating to such economic lives or useful lives.

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

31. If the answer to Interrogatory No. 29 is in the affirmative, describe with particularity the rates, terms, conditions, nature, and purpose of any service that AT&T offers or plans to offer to provide telephone exchange service or interLATA service in Florida using cable television plant or equipment. In answering this Interrogatory, state whether AT&T intends for cable television plant or equipment to be used to bypass BellSouth's network and identify all documents referring or relating to any such intention.

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

39. Has AT&T entered into a joint marketing agreement with Time Warner Telecommunications or any company affiliated with Time Warner Telecommunications that would apply to the marketing of telecommunications services in the State of Florida?

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

40. If the answer to the foregoing Interrogatory is in the affirmative, please state the date when such joint marketing was entered into and describe the nature of the joint marketing arrangement, including the services involved and the date when such joint marketing began or is expected to begin in Florida.

OBJECTION: AT&T objects to this interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

SUBMITTED this 28th day of June, 2000.



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ATTORNEY FOR AT&T
COMMUNICATIONS OF THE SOUTHERN
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