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RECORDS AND REPORTING

June 29, 2000

VIA HAND DELIVERY

Ms. 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

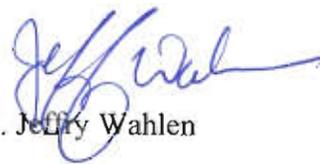
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of ALLTEL's Objections to BellSouth's First Set of Interrogatories.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,



J. Jeffrey Wahlen

Enclosures

- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CC: All Parties of Record
- OMP 5
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- EGR \_\_\_\_\_
- LEG 2
- OPC \_\_\_\_\_
- PAI \_\_\_\_\_
- REG \_\_\_\_\_
- SEC 1
- SER \_\_\_\_\_
- OTH \_\_\_\_\_

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DOCUMENT NUMBER - DATE

07906 JUN 29 8

FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into )  
pricing of unbundled network )  
elements )  
\_\_\_\_\_ )

DOCKET NO. 990649-TP  
DATED: June 29, 2000

**ALLTEL'S OBJECTIONS TO BELLSOUTH'S  
FIRST SET OF INTERROGATORIES**

Pursuant to Rule 28-106.206, Florida Administrative Code, ALLTEL Communications, Inc. hereby provides, on behalf of ALLTEL Communications Services, Inc., the following objections to BellSouth Telecommunications, Inc.'s ("BellSouth") First Set of Interrogatories to ALLTEL Communications Services, Inc.

**General Objections**

1. ALLTEL Communications, Inc. objects to the First Set of Interrogatories in its entirety on grounds that ALLTEL Communications Services, Inc. is not a party to this case and is not subject to the jurisdiction of the Florida Public Service Commission ("FPSC" or "Commission") as a certificated telecommunications carrier. For purposes of these objections and any answers that may be given, ALLTEL Communications, Inc. will assume that BellSouth intended to send its First Set of Interrogatories to ALLTEL Communications, Inc., the party to this docket and the entity certificated by the FPSC as an alternative local exchange carrier. For purposes of these objections and any answer that may be given, the term "ALLTEL" shall mean "ALLTEL Communications, Inc."

2. ALLTEL objects to BellSouth's definition of ALLTEL to the extent it requires ALLTEL to respond on behalf of its parent, subsidiaries, affiliates, or other persons who are not

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FPSC-RECORDS/REPORTING

parties to this case or certificated by the FPSC as a telecommunications carrier on the grounds that the definition is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. For purposes of these objections and any answer that may be given, each reference to “ALLTEL” in BellSouth’s First Set of Interrogatories will be treated as referring exclusively to ALLTEL Communications, Inc., the certificated Alternative Local Exchange Telecommunications Company in Florida, and the party to this docket.

3. ALLTEL objects to BellSouth’s definition of “You” and “your” to the extent the definitions require ALLTEL to respond on behalf of its parent, subsidiaries, affiliates, or other persons who are not parties to this case on the grounds that the definition is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. For purposes of these objections and any answers that may be given, each reference to “ALLTEL” in BellSouth’s First Set of Interrogatories shall be treated as referring exclusively to ALLTEL Communications, Inc., a certificated Alternative Local Exchange Telecommunications Company in Florida, and the party to this docket.

4. ALLTEL objects to BellSouth’s general instructions, definitions, or specific discovery requests insofar as they seek to impose obligations on ALLTEL which exceed the requirements of Florida law or the Florida Rules of Civil Procedure. Specifically, ALLTEL objects to paragraph (e) of the Instructions to the First Interrogatories on the basis that it is contrary to Rule 1.280, Florida Rules of Civil Procedure, which provides as follows: “A party who has responded to a request for discovery with a response that was complete when made is under no duty to supplement the response to include information thereafter acquired.”

5. ALLTEL objects to each and every request to the extent that the information requested constitutes “trade secrets” which are privileged pursuant to Section 90.056, Florida

Statutes. To the extent BellSouth's requests seek proprietary confidential business information which is not the subject of the "trade secrets" privilege, ALLTEL will make such information available to counsel for BellSouth pursuant to an appropriate Protective Agreement, subject to all other general or specific objections contained herein.

6. ALLTEL is part of a large corporation with employees located in multiple locations in Florida and other states. In the course of business, ALLTEL creates innumerable documents that are not subject to Florida Public Service Commission or FCC record retention requirements. These documents are kept in numerous locations and frequently moved to other locations as deemed appropriate by management. To the extent answers are given, those answers will provide information obtained by ALLTEL after a reasonable and diligent search conducted in connection with these interrogatories. ALLTEL will comply with BellSouth's request that a search be conducted of those files that are reasonably expected to contain the requested information. To the extent that the interrogatory purports to require more, ALLTEL objects on the grounds that compliance would impose an undue burden or expense.

7. ALLTEL objects to each and every interrogatory insofar as the request is vague, overbroad, oppressive, ambiguous, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these interrogatories.

8. Any answer provided by ALLTEL in response to BellSouth's First Set of Interrogatories is provided subject to, and without waiver of, the foregoing General Objections.

#### **Specific Objections**

In addition to its general objections, which are incorporated into each of its specific objections below, ALLTEL objects to the specific interrogatories in the First Set of Interrogatories as set forth below:

1. **Identify all persons participating in the preparation of the answers to these Interrogatories or supplying information used in connection therewith and describe the extent of each person's participation, including any information that person provided.**

Answer: ALLTEL will answer this interrogatory subject to its general objections.

2. **Does ALLTEL provide telephone exchange service in the State of Florida?**

Answer: ALLTEL will answer this interrogatory subject to its general objections.

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

Objection: ALLTEL objects to this Interrogatory on the grounds that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

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

Objection: ALLTEL objects to this Interrogatory on the grounds that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

5. **If the answer to the foregoing Interrogatory is in the affirmative, for each switch owned or operated by ALLTEL 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: ALLTEL objects to this Interrogatory on the grounds that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

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 ALLTEL owns or operates to provide telephone exchange service in the State of Florida.**

Objection: ALLTEL objects to this Interrogatory on the grounds that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

7. **Please state the economic lives or useful lives used by ALLTEL 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 ALLTEL for depreciation purposes for the switches it owns or operates to provide telephone exchange service in Florida.**

Objection: ALLTEL objects to this Interrogatory on the grounds that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

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

Objection: ALLTEL objects to this Interrogatory on the grounds that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

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 ALLTEL owns or operates to provide telephone exchange service in the State of Florida.**

Objection: ALLTEL objects to this Interrogatory on the grounds that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

10. **Please state the economic lives or useful lives used by ALLTEL 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 ALLTEL for depreciation purposes for the cable it owns or operates to provide telephone exchange service in Florida.**

Objection: ALLTEL objects to this Interrogatory on the grounds that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

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

Objection: ALLTEL objects to this Interrogatory on the grounds that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

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 ALLTEL owns or operates to provide telephone exchange service in the State of Florida.

Objection: ALLTEL objects to this Interrogatory on the grounds that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

13. Please state the economic lives or useful lives used by ALLTEL 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 ALLTEL for depreciation purposes for the digital circuit equipment it owns or operates to provide telephone exchange service in Florida.

Objection: ALLTEL objects to this Interrogatory on the grounds that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

14. Does ALLTEL provide interLATA service in the State of Florida?

Objection: ALLTEL objects to this Interrogatory on the grounds that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

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

Objection: ALLTEL objects to this Interrogatory on the grounds that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

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

Objection: ALLTEL objects to this Interrogatory on the grounds that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

**17. If the answer to the foregoing Interrogatory is in the affirmative, for each switch owned or operated by ALLTEL 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: ALLTEL objects to this Interrogatory on the grounds that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

**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 ALLTEL owns or operates to provide interLATA service in the State of Florida.**

Objection: ALLTEL objects to this Interrogatory on the grounds that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

**19. Please state the economic lives or useful lives used by ALLTEL 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 ALLTEL for depreciation purposes for the switches it owns or operates to provide interLATA service in Florida.**

Objection: ALLTEL objects to this Interrogatory on the grounds that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

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

Objection: ALLTEL objects to this Interrogatory on the grounds that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

**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 ALLTEL owns or operates to provide interLATA service in the State of Florida.**

Objection: ALLTEL objects to this Interrogatory on the grounds that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

**22. Please state the economic lives or useful lives used by ALLTEL 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 ALLTEL for depreciation purposes for the cable it owns or operates to provide interLATA service in Florida.**

Objection: ALLTEL objects to this Interrogatory on the grounds that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

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

Objection: ALLTEL objects to this Interrogatory on the grounds that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

**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 ALLTEL owns or operates to provide interLATA service in the State of Florida.**

Objection: ALLTEL objects to this Interrogatory on the grounds that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

**25. Please state the economic lives or useful lives used by ALLTEL 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 ALLTEL for depreciation purposes for the digital circuit equipment it owns or operates to provide interLATA service in Florida.**

Objection: ALLTEL objects to this Interrogatory on the grounds that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

**26. Does ALLTEL currently offer or plan to offer fixed wireless service to provide telephone exchange service or interLATA service in Florida?**

Objection: ALLTEL objects to this Interrogatory on the grounds that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

**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 ALLTEL's accounting records) which ALLTEL 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: ALLTEL objects to this Interrogatory on the grounds that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

**28. Does ALLTEL currently provide or plan to provide telephone exchange service or interLATA service in Florida using cable television plant or equipment?**

Objection: ALLTEL objects to this Interrogatory on the grounds that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

**29. 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 ALLTEL's accounting records) which ALLTEL 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: ALLTEL objects to this Interrogatory on the grounds that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

DATED this 29<sup>th</sup> day of June, 2000.

  
\_\_\_\_\_  
J. JEFFREY WAHLEN  
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Post Office Box 391  
Tallahassee, Florida 32302  
850/425-5471

ATTORNEYS FOR ALLTEL  
COMMUNICATIONS, INC.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing has been furnished U. S. Mail or hand delivery (\*) this 29<sup>th</sup> day of June 2000, to the following:

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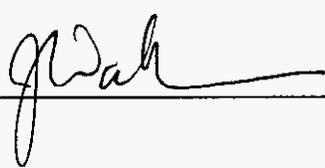
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Attorney