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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 Request for Production of Documents.

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

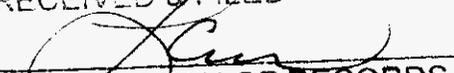
Thank you for your assistance in this matter.

Sincerely,


J. Jeffrey Wahlen

- APP _____
- CAE _____
- CMP dt
- COM 5cc: All Parties of Record
- CTR _____
- ECR _____
- LEG 2
- OPC _____
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- SER _____
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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

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

**ALLTEL'S OBJECTIONS TO BELL SOUTH'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Pursuant to Rule 28-106.206, Florida Administrative Code, ALLTEL Communications, Inc., by and through its undersigned counsel, hereby responds on behalf of ALLTEL Communications Services, Inc. to BellSouth's First Request for Production of Documents to ALLTEL Communications Services, Inc. as set forth below.

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 responses that may be given, ALLTEL Communications, Inc. will assume that BellSouth intended to send its First Request for Production 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 responses 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 responses that may be given, each reference to “ALLTEL” in BellSouth’s First Request for Production 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 responses that may be given, each reference to “ALLTEL” in BellSouth’s First Request for Production 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. These responses will provide information obtained by ALLTEL after a reasonable and diligent search conducted in connection with this request. 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 discovery request 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 request 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 requests.

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

Specific Responses

- 1. Produce all documents identified in response to BellSouth's First Set of Interrogatories.**

Objection: ALLTEL objects to this request 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.

- 2. Produce all documents furnished or provided by ALLTEL or on ALLTEL's behalf to its shareholders, accountants, auditors, creditors, or to stock analysts referring or relating to the economic lives or useful lives used by ALLTEL for depreciation purposes for the switches, cable, and digital circuit equipment ALLTEL uses to provide telephone exchange service or interLATA service in Florida.**

Objection: ALLTEL objects to this request 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.

- 3. Produce all documents furnished or provided by ALLTEL or on ALLTEL's behalf to its shareholders, accountants, auditors, creditors, or to stock analysts referring or relating to the economic lives or useful lives used by ALLTEL for depreciation purposes for fixed wireless equipment ALLTEL uses to provide telephone exchange service or interLATA service in Florida.**

Objection: ALLTEL objects to this request 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. **Produce all documents furnished or provided by ALLTEL or on ALLTEL's behalf to its shareholders, accountants, auditors, creditors, or to stock analysts referring or relating to the economic lives or useful lives used by ALLTEL for depreciation purposes for cable television plant or equipment ALLTEL uses to provide telephone exchange service in interLATA service in Florida.**

Objection: ALLTEL objects to this request 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 29th day of June, 2000.



J. HENRY WAHLEN
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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 29th day of June 2000, to the following:

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