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RECORDS AND REPORTING

August 14, 2000

BY HAND DELIVERY

Ms. Blanca Bayó, Director
Division of Records and Reporting
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: FPSC Docket No. 990649-TP

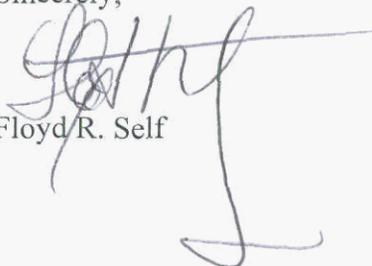
Dear Ms. Bayó:

Enclosed for filing on behalf of AT&T Communications of the Southern States, Inc. are an original and fifteen copies of AT&T's Objections to BellSouth Telecommunications, Inc.'s Second Set of Interrogatories and AT&T Objections to BellSouth Telecommunications, Inc.'s Second Request for Production of Documents in the above referenced docket.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,


Floyd R. Self

- APP _____
- CAF _____
- CMP *allala*
- COM _____
- CTR _____
- ECR _____
- LEG 2 Enclosure
- OPC _____
- PAI _____
- RGO _____
- SEC 1
- SER _____
- OTH _____

cc: Jim Lamoureux, Esq.
Parties of Record

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
09820 AUG 14 8
FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 990649-TP
Filed: August 14, 2000

AT&T'S OBJECTIONS TO BELLSOUTH TELECOMMUNICATIONS, INC.'S
SECOND 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") Second 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-00-0540-PCO-TP issued by the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced docket. 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

09820 AUG 14 8

FPSC RECORDS/REPORTING

General Objections

AT&T makes the following General Objections to BellSouth's Second 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 Second 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.

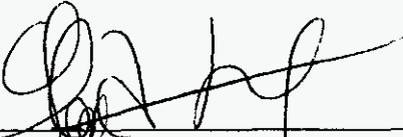
Objections to Specific Interrogatories

Subject to, and without waiver of, the foregoing general objections, AT&T enters the following specific objections with respect to BellSouth's interrogatories:

47. For each unbundled network element or interconnection service for which AT&T is proposing recurring and nonrecurring rates as identified in Exhibit JAK-1 to the Pre-Filed Rebuttal Testimony of Jeffrey King, identify the lowest rate for that same element or service approved by any state public service commission in a proceeding in which AT&T has participated. In answering this Interrogatory, identify the state commission, state the docket number, and identify each such commission order establishing those rates.

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. In addition, AT&T objects to this interrogatory as being overly broad and unduly burdensome to the extent it seeks information from AT&T for states other than Florida.

SUBMITTED this 14th day of August, 2000.



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and

Jim Lamoureux, Esq.
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Attorney for AT&T Communications of the
Southern States, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of AT&T's Objections to BellSouth Telecommunications, Inc.'s Second Set of Interrogatories to AT&T Communications of the Southern States, Inc. in Docket No. 990649-TP has been furnished by Hand Delivery (*) and/or U. S. Mail to the following parties of record this 14th day of August, 2000:

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Atlanta, GA 30309

A handwritten signature in black ink, appearing to read "Floyd R. Self", written over a horizontal line. The signature is stylized and cursive.

Floyd R. Self

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 990649-TP
Filed: August 14, 2000

**AT&T'S OBJECTIONS TO BELL SOUTH TELECOMMUNICATIONS, INC.'S
SECOND 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 BellSouth Telecommunications, Inc.'s (hereinafter BellSouth) Second 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-00-0540-PCO-TP issued by the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced docket. 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 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 Responses on BellSouth.

General Objections

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

1. AT&T objects to BellSouth's Second 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 BellSouth'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 BellSouth'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 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 request, 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 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 BellSouth'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 BellSouth pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

10. 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 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, AT&T objects on the grounds that compliance would impose an undue burden or expense.

11. 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 BellSouth's requests should be taken to mean AT&T Communications of the Southern States, Inc.

12. AT&T objects to the definitions of "you" and "your" 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 BellSouth's requests should be taken to mean AT&T Communications of the Southern States, Inc.

Objections to Specific Requests

Subject to, and without waiver of, the foregoing general objections, AT&T enters the following specific objections with respect to BellSouth's requests:

18. Produce copies (including electronic copies) of all runs of the BSTLM or the BSCC conducted or performed by or on behalf of AT&T, including, but not limited to, a copy of the compact discs used in developing the cost of unbundled network elements and interconnection services as calculated by AT&T in this proceeding.

OBJECTION: AT&T objects to this request for production of documents on the grounds that it is over broad and burdensome in seeking copies of drafts and runs leading up to the development of AT&T's testimony. AT&T also objects to the extent this request 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 these objections, AT&T will attempt to identify and copy such materials.

22. Produce all documents referring or relating to any sensitivity analysis conducted or performed by or on behalf of AT&T in developing the cost of unbundled network elements and interconnection services as calculated by AT&T in this proceeding.

OBJECTION: AT&T objects to this request for production of documents on the grounds that it is over broad and burdensome in seeking copies of all sensitivity analysis conducted or performed in developing AT&T's testimony. AT&T also objects to the extent this request 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 these objections, AT&T will attempt to identify and copy such materials.

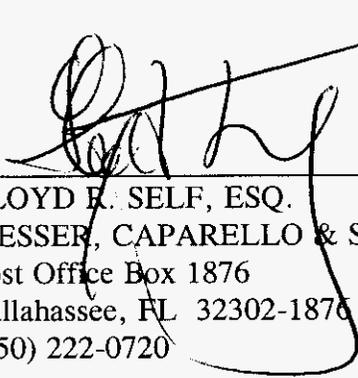
23. Produce copies (including electronic copies) of all documents generated by Brian Pitkin or at his direction that refer or relate to any of the issues contained in his prefiled testimony filed in this proceeding.

OBJECTION: AT&T objects to this request for production of documents on the grounds that it is over broad and burdensome in seeking copies of all documents created by Brian Pitkin in developing his testimony. AT&T also objects to the extent this request seeks information that is privileged or otherwise not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding these objections, AT&T will attempt to identify and copy such materials that are not privileged.

28. Produce copies of all documents that you contend support each adjustment that was made to the BSTLM, the BSCC, or any other applicable cost model submitted by BellSouth in arriving at the proposed recurring and nonrecurring rates identified in Exhibit JAK-1 to the Pre-Filed Rebuttal Testimony of Jeffrey King.

OBJECTION: AT&T objects to this request for production of documents on the grounds that it is over broad and burdensome in seeking copies of all documents used to support the adjustments made by Jeff King in his Exhibit JAK-1 and testimony. AT&T also objects to the extent this request 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 these objections, AT&T will attempt to identify and copy such materials.

SUBMITTED this 14th day of August, 2000.



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Attorney for AT&T Communications of the
Southern States, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of AT&T's Objections to BellSouth Telecommunications, Inc.'s Second Request for Production of Documents to AT&T Communications of the Southern States, Inc. in Docket No. 990649-TP has been furnished by Hand Delivery (*) and/or U. S. Mail to the following parties of record this 14th day of August, 2000:

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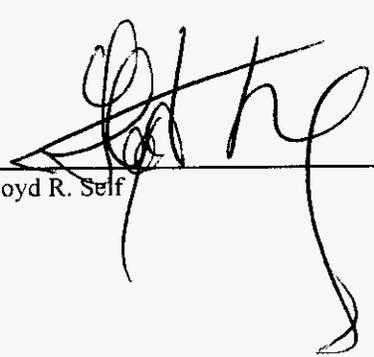
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