

NANCY B. WHITE
General Counsel - Florida

BellSouth Telecommunications, Inc.
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ORIGINAL

November 20, 2000

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RECORDS AND REPORTING

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

Re: Docket No. 000731-TP (AT&T Arbitration)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Objections to AT&T Communications of the Southern States, Inc.'s First Request for Production of Documents and First Set of Interrogatories, which we ask that you file in the captioned docket.

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,

Nancy B. White
Nancy B. White *(initials)*

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

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**CERTIFICATE OF SERVICE
Docket No. 000731-TP**

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

U.S. Mail this 20th day of November, 2000 to the following:

Lee Fordham
Staff Counsel
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Marsha Rule
AT&T Communications of the Southern
States, Inc.
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
Tel. No. (850) 425-6365

Virginia Tate
AT&T Communications of the Southern
States, Inc.
1200 Peachtree Street, N.W.
Suite 8100
Atlanta, GA 30309
Tel. No. (404) 810-4922



Nancy B. White

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition by AT&T Communications of the)
Southern States, Inc. for arbitration of)
certain terms and conditions of a proposed)
agreement with BellSouth)
Telecommunications, Inc. pursuant to)
47 U.S.C. Section 252.)
_____)

Docket No. 000731-TP

Filed: 11/20/00

**BELLSOUTH TELECOMMUNICATIONS, INC.'S OBJECTIONS TO
AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND
FIRST SET OF INTERROGATORIES**

BellSouth Telecommunications, Inc., ("BellSouth") pursuant to the Order Establishing Procedure (PSC-00-1634-PCO-TP), issued September 13, 2000, objects to AT&T of the Southern States, Inc.'s ("AT&T") First Request for Production of Documents and First Set of Interrogatories, both dated November 10, 2000, and says:

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 its parent, 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

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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.

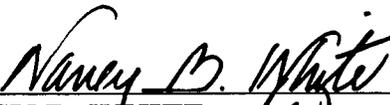
3. BellSouth objects to AT&T's interrogatories and request for production of documents, instructions and definitions, insofar as they seek to impose obligations on BellSouth that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

4. 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.

Subject to the forgoing general objections, BellSouth will respond to AT&T's First Interrogatories and First Request for Production of Documents.

Respectfully submitted this 20th day of November, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.



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