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Legal Department

E EARL EDENFIELD JR.  
General Attorney

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BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0763

RECORDS AND  
REPORTING

December 4, 2000

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. 000828-TP (Sprint Arbitration)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Objections to Staff'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,

*E. Earl Edenfield Jr.*  
(PW)

E. Earl Edenfield Jr.

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OTH \_\_\_\_\_

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

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**CERTIFICATE OF SERVICE**  
**Docket No. 000828-TP**

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

U.S. Mail on the 4th day of December, 2000 to the following:

Timothy Vaccaro  
Staff Counsel  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6181  
Fax No. (850) 413-6182

Charles J. Rehwinkel  
Susan Masterton  
Sprint  
1313 Blair Stone Road  
Tallahassee, FL 32301  
Tel. No. (850) 847-0244  
Fax. No. (850) 878-0777

William R. Atkinson  
Benjamin W. Fincher  
Sprint  
3100 Cumberland Circle  
Atlanta, Georgia 30339  
Tel. No. (404) 649-6221  
Fax. No. (404) 649-5174

  
E. Earl Edenfield Jr. (bw)

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In the Matter of: )  
 ) Docket No. 000828-TP  
Petition of Sprint Communications Company L.P. for )  
Arbitration with BellSouth Telecommunications, Inc, )  
Pursuant to Section 252(b) of the Telecommunications )  
Act of 1996. ) Filed: December 4, 2000  
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**BELLSOUTH TELECOMMUNICATIONS, INC.'S OBJECTIONS TO STAFF'S  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS  
AND FIRST SET OF INTERROGATORIES**

BellSouth Telecommunications, Inc., ("BellSouth") pursuant to the Order Establishing Procedure (PSC-00-1823-PCO-TP), objects to the Commission Staff's First Request for Production of Documents and First Set of Interrogatories, both dated November 22, 2000, and says:

**GENERAL OBJECTIONS**

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 subsidiaries, 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 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.

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3. BellSouth objects to each and every interrogatory, request for production of documents, and instruction to the extent that such interrogatory, request for production of documents, or instruction calls for information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. BellSouth objects to each and every interrogatory and request for production of documents insofar as the interrogatory and request for production of documents are vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of such interrogatory and request for production of documents. Any answers provided by BellSouth in response to these interrogatories and request for production of documents will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth objects to each and every interrogatory and request for production of documents insofar as the interrogatory and request for production of documents are not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

6. BellSouth objects to providing information to the extent that such information is already in the public record before the Commission.

7. BellSouth objects to each and every interrogatory and request for production of documents to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to §90.506, *Florida Statutes*. BellSouth also objects to each and every interrogatory and request for production of documents that would require the disclosure of customer specific information, the disclosure of which is prohibited by §364.24, *Florida Statutes*. To the extent that Staff requests proprietary information that is not subject to the "trade

secrets” privilege or to §364.24, BellSouth will make such information available to Staff at a mutually agreeable time and place upon the execution of a confidentiality agreement, or subject to a Request for Confidential Classification.

8. BellSouth objects to Staff’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.

9. BellSouth objects to each and every interrogatory and request for production of documents insofar as any of them is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

10. 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.

WHEREFORE, BellSouth respectfully requests that the Commission sustain each of the objections set forth herein.

Respectfully submitted this 4<sup>th</sup> day of December 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Nancy B. White*

NANCY B. WHITE  
MICHAEL P. GOGGIN

c/o Nancy H. Sims  
150 So. Monroe Street, Suite 400  
Tallahassee, FL 32301  
(305) 347-5558

*R. Douglas Lackey*

R. DOUGLAS LACKEY  
E. EARL EDENFIELD JR.

Suite 4300  
675 W. Peachtree St., NE  
Atlanta, GA 30375  
(404) 335-0763