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May 31, 2001

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

**Re: 960786-TL (Section 271)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Objections to Florida Competitive Carrier'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 by U.S. Mail as shown on the attached Certificate of Service.

Sincerely,



Lisa S. Foshee (LA)

Enclosures

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

DOCUMENT NUMBER-DATE

06864 MAY 31 2001

FPSC-RECORDS/REPORTING

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Consideration of )  
BellSouth Telecommunications, Inc.'s )  
Entry Into InterLATA ) Docket No. 960786-TL  
Services Pursuant to Section 271 )  
Of the Federal Telecommunications Act ) Filed: May 31, 2001  
Of Act of 1996. )  
\_\_\_\_\_ )

**BELLSOUTH TELECOMMUNICATIONS, INC.'S OBJECTIONS TO  
FLORIDA COMPETITIVE CARRIER'S ASSOCIATION'S FIRST REQUEST FOR  
PRODUCTION OF DOCUMENTS AND FIRST SET OF INTERROGATORIES**

BellSouth Telecommunications, Inc., ("BellSouth") hereby makes the following objections to Florida Competitive Carrier's Association's ("FCCA") First Request for Production of Documents and First Set of Interrogatories, both dated May 21, 2001, 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.

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*. BellSouth also objects to the disclosure of confidential business information. To the extent that FCCA requests confidential business information that is not subject to the "trade

secrets” privilege, BellSouth will make such information available to counsel for FCCA pursuant to an appropriate Protective Agreement, subject to any other general objections contained herein.

8. BellSouth objects to FCCA’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.

BellSouth has made herein the objections it has noted thusfar. BellSouth specifically reserves the right to make additional objections as it continues to review the requests and its responses thereto.

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

Respectfully submitted this 31<sup>th</sup> day of May 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Nancy B. White*

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**CERTIFICATE OF SERVICE  
DOCKET NO. 960786-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by  
U. S. Mail this 31st day of May, 2001 to the following:

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**(+) Signed Protective Agreement**