

Andrew D. Shore
Senior Regulatory Counsel

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0743

January 22, 2002

Mrs. Blanca S. Bayó
Director, Division of the Commission
Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850


Re: Docket No. 990649A-TP (UNE Docket)

Dear Mrs. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s General Objections to Florida Digital Network, Inc.'s First Set of Interrogatories and First Request for Production of Documents 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,



Andrew D. Shore

(22)

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

DOCUMENT NUMBER-DATE
00788 JAN 22 8
FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE
Docket No. 990649A-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
Federal Express this 22nd day of January, 2002 to the following:

Wayne D. Knight
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6216
Fax. No. (850) 413-6217
wknight@psc.state.fl.us

Joseph A. McGlothlin (+)
Vicki Gordon Kaufman (+)
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman, Arnold,
& Steen, P.A.
117 South Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 222-2525
Fax. No. (850) 222-5606
Attys. For FCCA
Atty. for BlueStar
jmcglothlin@mac-law.com

Karen Jusevitch
AT&T Communications
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
Tel. No. (850) 425-6313
Fax. No. (850) 425-6361
kjusevit@att.com

Jim Lamoureux (+)
AT&T Communications
1200 Peachtree Street, N.E.
Room 8068
Atlanta, Georgia 30309
Tel. No. (404) 810-4196
Fax. No. (404) 877-7648
jlamoureux@att.com

Richard D. Melson (+)
Gabriel E. Nieto
Hopping Green Sams & Smith, P.A.
Post Office 6526
123 South Calhoun Street
Tallahassee, FL 32314
Tel. No. (850) 222-7500
Fax. No. (850) 224-8551
Atty. For MCI
rmelson@hgss.com

Dulaney L. O'Roark
MCI Telecommunications Corporation
6 Concourse Parkway
Suite 600
Atlanta, GA 30328
Tel. No. (770) 284-5498
Fax. No. (770) 284-5488
De.OROark@mci.com

Floyd Self
Messer, Caparello & Self
Post Office Drawer 1876
215 South Monroe Street, Suite 701
Tallahassee, FL 32302-1876
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Atty. for AT&T
fself@lawfla.com

Terry Monroe
Vice President, State Affairs
Competitive Telecomm. Assoc.
1900 M Street, N.W.
Suite 800
Washington, D.C. 20036
Tel. No. (202) 296-6650
Fax. No. (202) 296-7585
tmonroe@comptel.org

Kimberly Caswell (+)
GTE Florida Incorporated
One Tampa City Center
201 North Franklin Street
Tampa, Florida 33602
Tel. No. (813) 483-2617
Fax. No. (813) 204-8870
kimberly.caswell@verizon.com

Karen M. Camechis (+)
Pennington, Moore, Wilkinson &
Dunbar, P.A.
215 South Monroe Street, 2nd Flr.
Tallahassee, Florida 32301
Tel. No. (850) 222-3533
Fax. No. (850) 222-2126
Represents Time Warner
Karen@penningtonlawfirm.com

Carolyn Marek (+)
Vice President of Regulatory Affairs
Southeast Region
Time Warner Communications
233 Bramerton Court
Franklin, Tennessee 37069
Tel. No. (615) 376-6404
Fax. No. (615) 376-6405
Carolyn.Marek@twtelecom.com

Mark E. Buechele, Esquire
Supra Telecom
1311 Executive Center Drive
Koger Center - Ellis Building
Suite 200
Tallahassee, FL 32301-5027
Tel. No. (850) 402-0510
Fax. No. (850) 402-0522
mbuechele@stis.com
bchaiken@stis.com

Donna Canzano McNulty, Esq. (+)
MCI WorldCom, Inc.
325 John Knox Road
The Atrium Bldg., Suite 105
Tallahassee, FL 32303
Tel. No. (850) 422-1254
Fax. No. (850) 422-2586
donna.mcnulty@wcom.com

Michael A. Gross (+)
VP Reg. Affairs & Reg. Counsel
Florida Cable Telecomm. Assoc.
246 East 6th Avenue
Tallahassee, FL 32303
Tel. No. (850) 681-1990
Fax. No. (850) 681-9676
mgross@fcta.com

Florida Public Telecomm. Assoc.
Angela Green, General Counsel
2292 Wednesday Street, #1
Tallahassee, FL 32308
Tel. No. (850) 201-2525
Fax. No. (850) 222-1355
abgreen@coraltelecom.com

Intermedia Communications, Inc.
Scott Sapperstein (+)
Sr. Policy Counsel
One Intermedia Way
MCFLT-HQ3
Tampa, FL 33647
Tel. No. (813) 829-4093
Fax. No. (813) 829-4923
SASapperstein@intermedia.com

Charles J. Rehwinkel (+)
1313 Blair Stone Road
Tallahassee, FL 32301
Tel. No. (850) 847-0244
Fax. No. (850) 878-0777
Counsel for Sprint
charles.j.rehwinkel@mail.sprint.com

John P. Fons (+)
Ausley & McMullen
227 South Calhoun Street
Tallahassee, FL 32301
Tel. No. (850) 224-9115
Fax. No. (850) 222-7560
Counsel for Sprint
jfons@ausley.com

Brian Sulmonetti
MCI WorldCom, Inc.
6 Concourse Parkway
Suite 3200
Atlanta, GA 30328
Tel. No. (770) 284-5500
Brian.Sulmonetti@wcom.com

Catherine F. Boone, Esq. (+)
Regional Counsel

Covad Communications Company
10 Glenlake Parkway
Suite 650
Atlanta, GA 30328-3495
Tel. No. (678) 579-8388
Fax. No. (678) 320-9433
cboone@covad.com

Charles J. Beck
Deputy Public Counsel
Office of the Public Counsel
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400
Tel. No. (850) 488-9330
Fax. No. (850) 488-4491
beck.charles@leg.state.fl.us

Eric J. Branfman (+)
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007-5116
Tel. No. (202) 424-7500
Fax. No. (202) 424-7645
Represents Florida Digital Network, Inc.
ejbranfman@swidlaw.com

Matthew Feil
Florida Digital Network, Inc.
390 North Orange Avenue
Suite 2000
Orlando, FL 32801
Tel. No. (407) 835-0460
mfeil@floridadigital.net

John McLaughlin
KMC Telecom. Inc.
Mr. John D. McLaughlin, Jr.
1755 North Brown Road
Lawrenceville, GA 30043
Tel. No. (678) 985-6261
Fax. No. (678) 985-6213
jmclau@kmctelecom.com

Bettye Willis (+)
ALLTEL Communications

Services, Inc.
One Allied Drive
Little Rock, AR 72203-2177
bettye.j.willis@alltel.com

J. Jeffry Wahlen (+)
Ausley & McMullen
227 South Calhoun Street
Tallahassee, FL 32301
Tel. No. (850) 425-5471
Fax. No. (850) 222-7560
Atty. for ALLTEL
jwahlen@ausley.com

Stephen P. Bowen
Blumenfeld & Cohen
4 Embarcadero Center
Suite 1170
San Francisco, CA 94111
Tel. No. (415) 394-7500
Fax. No. (415) 394-7505
stevebowen@earthlink.net

Charles J. Pellegrini
Katz, Kutter, Haigler, Alderman, Bryant
& Yon, P.A.
106 East College Avenue
Suite 1200
Tallahassee, FL 32301
Represents Intermedia
Tel. No. (850) 577-6755
Fax No. (850) 222-0103
cjpellegrini@katzlaw.com

George S. Ford (+)
Chief Economist
Z-Tel Communications, Inc.
601 South Harbour Island Blvd.
Tampa, FL 33602
Tel. No. (813) 233-4630
Fax. No. (813) 233-4620
gford@z-tel.com

Jonathan E. Canis
Michael B. Hazzard

Kelley Drye & Warren, LLP
1200 19th Street, NW, Fifth Floor
Washington, DC 20036
Tel. No. (202) 955-9600
Fax. No. (202) 955-9792
jcanis@kelleydrye.com
mhazzard@kelleydrye.com
Counsel for Z-Tel Communications, Inc.

Rodney L. Joyce
Shook, Hardy & Bacon, LLP
600 14th Street, N.W., Suite 800
Washington, D.C. 20005-2004
Tel. No. (202) 639-5602
Fax. No. (202) 783-4211
rjoyce@shb.com
Represents Network Access Solutions

Russell M. Blau
Thomas R. Lotterman (+)
Michael Sloan (+)
Robert Ridings (+)
Swidler Berlin Shereff Friedman
3000 K Street, N.W.
Suite 300
Washington, D.C. 20007-5116
Tel. No. (202) 424-7755
Fax. No. (202) 424-7643
Attys. for Broadslate Networks, Inc.
Attys. for Cleartel Comm.
MCSloan@swidlaw.com
rmbrau@swidlaw.com
rjridings@swidlaw.com
trlotterman@swidlaw.com

John Spilman
Director Regulatory Affairs and
Industry Relations
Broadslate Networks, Inc.
675 Peter Jefferson Parkway
Suite 310
Charlottesville, VA 22911
Tel. No. (804) 220-7606
Fax. No. (804) 220-7701
john.spilman@broadslate.net

Andrew D. Shore
Andrew D. Shore (2f)

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into) Docket No. 990649A-TP
Pricing of Unbundled Network)
Elements)
_____) Filed: January 22, 2002

**BELLSOUTH TELECOMMUNICATIONS, INC.'S GENERAL OBJECTIONS TO
FLORIDA DIGITAL NETWORK, INC.'S
FIRST SET OF INTERROGATORIES AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.340 and 1.280, Florida Rules of Civil Procedure, hereby files the following Objections to Florida Digital Network, Inc.'s. ("FDN") First Set of Interrogatories and First Request for Production of Documents dated January 9, 2002.

The objections stated herein are preliminary in nature and are made at this time to comply with the 10-day requirement set forth in Order No. PSC-01-1904-PCO-TP issued on September 24, 2001, by the Florida Public Service Commission ("Commission). Should additional grounds for objection be discovered as BellSouth prepares its answers to the above-referenced discovery requests and request for production of documents, BellSouth reserves the right to supplement, revise, or modify its objections at the time it serves its responses.

GENERAL OBJECTIONS

1. BellSouth objects to FDN's discovery requests on the grounds that they are untimely. FDN served its discovery on January 9, 2002, which makes the due date for BellSouth to serve responses January 24, 2002. The Commission's Order Establishing Procedure, Order No. PSC-01-1904-PCD-TP, issued September 24, 2001, states that "all discovery shall be completed by January 23, 2002. Since BellSouth is permitted 15 days, or until January 24, to respond to FDN's discovery requests, responses are not due until after the discovery cut-off date. The requests are, therefore, untimely.

2. BellSouth objects to the discovery requests 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 discovery requests are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

3. BellSouth objects to the discovery requests 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 discovery requests as being irrelevant, overly broad, unduly burdensome, and oppressive.

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

5. BellSouth objects to each and every discovery request insofar as the discovery requests 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 these discovery requests. Any answers provided by BellSouth in response to the discovery requests will be provided subject to, and without waiver of, the foregoing objection.

6. BellSouth objects to each and every discovery request insofar as it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. BellSouth will attempt to note in its responses each instance where this objection applies.

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

8. BellSouth objects to FDN discovery requests, 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.

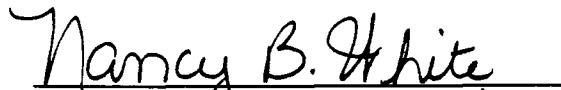
9. BellSouth objects to each and every discovery request, insofar as any of them are unduly burdensome, expensive, oppressive, or excessively time consuming as written.

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

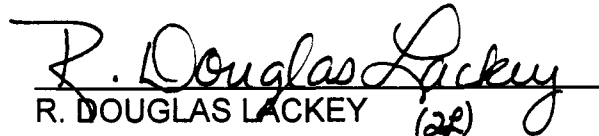
or as the business is reorganized. Therefore, it is possible that not every document has been identified in response to these requests. BellSouth will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the requests purport to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

Respectfully submitted this 22nd day of January, 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE (22)
JAMES MEZA III
c/o Nancy H. Sims
150 So. Monroe Street, Suite 400
Tallahassee, FL 32301
(305) 347-5558



R. DOUGLAS LACKEY (22)
ANDREW SHORE
Suite 4300
675 W. Peachtree St., NE
Atlanta, GA 30375
(404) 335-0747

429876