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October 28, 2002

VIA HAND DELIVERY

Blanca S. Bayo, Director
Division of Records and Reporting
Betty Easley Conference Center
4075 Esplanade Way
Tallahassee, Florida 32399-0870

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Re: Docket Nos.: 020119-TP and 020578-TP

Dear Ms. Bayo:

On behalf of ACCESS Integrated Networks, Inc., enclosed for filing and distribution are the original and 15 copies of ACCESS Integrated Networks, Inc.'s Objections to BellSouth's First Set of Interrogatories (Nos. 1-30) and First Request for Production of Documents (Nos. 1-31).

Please acknowledge receipt of the above on the extra copy and return the stamped copy to me. Thank you for your assistance.

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Sincerely,

JAM
Joseph A. McGlothlin

JAM/mls
Enclosure

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for expedited review and cancellation of BellSouth Telecommunications, Inc.'s Key Customer promotional tariffs and for investigation of BellSouth's promotional pricing and marketing practices, by Florida Digital Network, Inc.

Docket No.: 020119-TP

In Re: Petition for expedited review and cancellation Of BellSouth Telecommunications, Inc.'s Key Customer promotional tariffs by Florida Competitive Carriers Association.

Docket No.: 020578-TP

Filed: October 28, 2002

**ACCESS INTEGRATED NETWORKS, INC.'S
OBJECTIONS TO BELL SOUTH TELECOMMUNICATIONS, INC.'S
FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS (NOS. 1 - 31)
TO ACCESS INTEGRATED NETWORKS, INC.**

Pursuant to Rule 28-106.206, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, the Access Integrated Networks, Inc. ("Access") Objects to BellSouth Telecommunications, Inc.'s ("BellSouth") First Requests for Production of Documents and states as follows:

General Objections

1. Access objects to any request that calls for the production of documents protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law, whether such privilege or protection appears at the time the response is first made to these requests or is later determined to be applicable based on the discovery of documents, investigation or analysis. Access in no way intends to waive any such privilege or protection.

2. In certain circumstances, Access may determine upon investigation and analysis that documents that respond to certain requests to which objections are not otherwise asserted are confidential and proprietary and should not be produced or should

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be produced only under an appropriate confidentiality agreement and protective order. By agreeing to produce documents in response to this request, Access is not waiving its right to insist upon appropriate protection of confidentiality by means of a confidentiality agreement and protective order. Access hereby asserts its right to require such protection of any and all documents that may qualify for protection under the Florida Rules of Civil Procedure and other applicable statutes, rules and legal principles.

3. Access objects to these definitions and instructions to the extent they purport to require Access to provide documents or other information on diskette. Access will entertain specific request to product electronic copies of documents that so exist in the normal course of business in a format designed to preserve the integrity of these documents.

4. Access objects to these requests to the extent they purport to require Access to prepare information or documents or perform calculations that Access has not prepared or performed in the normal course of business as an attempt to expand Access's obligations under applicable law. Access will comply with applicable law.

5. Access further objects to these requests and any definitions or instructions that purport to expand Access's obligations under applicable law. Access will comply with applicable law.

6. Access objects to any request that requires the production of "all" or "each" responsive document, as it can not guarantee, even after a good faith and reasonably diligent attempt, that "all" or "each" responsive document will be found.

7. Access incorporates by reference all of the foregoing general objections into each of its specific objections set forth below as though pleaded therein.

Specific Objections

8. Request for Production No. 1 states:

Please produce all documents that are identified in or support your response to BellSouth's First Set of Interrogatories, Item No. 1.

Access has objected to this Interrogatory. Access objects to this request as it seeks information protected by the attorney-client and work product privileges. Further, Access objects to this request as unduly burdensome as it seeks the production of "all documents."

9. Request for Production No. 2 states:

Please produce all documents that are identified in or support your response to BellSouth's First Set of Interrogatories, Item No. 2.

Access has objected to this Interrogatory. Access objects to this request as it seeks information protected by the work product privilege. Further, Access objects to this request as irrelevant and not reasonably calculated to the discovery of admissible evidence as it requests information regarding ALEC tariffs, which are not at issue in this case. In addition, Access objects to this request as unduly burdensome as it seeks the production of "all documents."

10. Request for Production No. 3 states:

Please produce all documents that are identified in or support your response to BellSouth's First Set of Interrogatories, Item No. 3.

Access has objected to this Interrogatory. Access objects to this request as it seeks information protected by the work product privilege. Further, Access objects to this request as unduly burdensome as it seeks the production of "all documents."

11. Request for Production No. 4 states:

Please produce all documents that are identified in or support your response to BellSouth's First Set of Interrogatories, Item No. 4.

Access has objected to this Interrogatory. Access objects to this request as it seeks information protected by the work product privilege. Further, Access objects to this request as unduly burdensome as it seeks the production of “all documents.”

12. Request for Production No. 5 states:

Please produce all documents that are identified in or support your response to BellSouth’s First Set of Interrogatories, Item No. 5.

Access has objected to this Interrogatory. Access objects to this request as irrelevant and not reasonably calculated to the discovery of admissible evidence as it requests information regarding ALEC tariffs, which are not at issue in this case. Further, Access objects to this request as unduly burdensome as it seeks the production of “all documents.”

13. Request for Production No. 6 states:

Please produce all documents that are identified in or support your response to BellSouth’s First Set of Interrogatories, Item No. 6.

Access has objected to this Interrogatory. Access objects to this request as it seeks information protected by the work product privilege. Further, Access objects to this request as unduly burdensome as it seeks the production of “all documents.”

14. Request for Production No. 7 states:

Please produce all documents that are identified in or support your response to BellSouth’s First Set of Interrogatories, Item No. 7.

Access has objected to this Interrogatory. Access objects to this request as it seeks information protected by the work product privilege. Further, Access objects to this request as unduly burdensome as it seeks the production of “all documents.”

15. Request for Production No. 8 states:

Please produce all documents that are identified in or support your response to BellSouth's First Set of Interrogatories, Item No. 8.

Access has objected to this Interrogatory. Access objects to this request as it seeks information protected by the work product privilege. Further, Access objects to this request as unduly burdensome as it seeks the production of "all documents."

16. Request for Production No. 9 states:

Please produce all documents that are identified in or support your response to BellSouth's First Set of Interrogatories, Item No. 9.

Access has objected to this Interrogatory. Access objects to this request as it seeks information protected by the work product privilege. Further, Access objects to this request as unduly burdensome as it seeks the production of "all documents."

17. Request for Production No. 10 states:

Please produce all documents that are identified in or support your response to BellSouth's First Set of Interrogatories, Item No. 10.

Access has objected to this Interrogatory. Access objects to this request as it seeks information protected by the work product privilege. Further, Access objects to this request as unduly burdensome as it seeks the production of "all documents."

18. Request for Production No. 11 states:

Please produce all documents that are identified in or support your response to BellSouth's First Set of Interrogatories, Item No. 11.

Access has objected to this Interrogatory. Access objects to this request as it seeks information protected by the work product privilege. Further, Access objects to this request as unduly burdensome as it seeks the production of "all documents."

19. Request for Production No. 12 states:

Please produce all documents that are identified in or support your response to BellSouth's First Set of Interrogatories, Item No. 12.

Access has objected to this Interrogatory. Access objects to this request as unduly burdensome as it seeks the production of “all documents.”

20. Request for Production No. 14 states:

Please produce all documents that are identified in or support your response to BellSouth’s First Set of Interrogatories, Item No. 14.

Access has objected to this Interrogatory. Access objects to this request as it seeks information protected by the work product privilege. Further, Access objects to this request as unduly burdensome as it seeks the production of “all documents.”

21. Request for Production No. 15 states:

Please produce all documents that are identified in or support your response to BellSouth’s First Set of Interrogatories, Item No. 15.

Access has objected to this Interrogatory. Access objects to this request as it seeks information protected by the work product privilege. Further, Access objects to this request as unduly burdensome as it seeks the production of “all documents.”

22. Request for Production No. 18 states:

Please produce all documents that are identified in or support your response to BellSouth’s First Set of Interrogatories, Item No. 18.

Access has objected to this Interrogatory. Access objects to this request as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence as it seeks information regarding Access’ tariffs, which are not at issue in this case. In addition, the request is irrelevant because under Florida law, which is designed to encourage nascent competition, the standard governing the regulation of the promotions and offerings of a dominant incumbent differs from that applicable to a new entrant that has no ability to

control the market. Access further objects to this request as unduly burdensome as it seeks the production of “all documents.”

23. Request for Production No. 20 states:

Please produce all documents that are identified in or support your response to BellSouth’s First Set of Interrogatories, Item No. 20.

Access has objected to this Interrogatory. Access objects to this request as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence as it seeks information regarding Access’ tariffs, which are not at issue in this case. In addition, the request is irrelevant because under Florida law, which is designed to encourage nascent competition, the standard governing the regulation of the promotions and offerings of a dominant incumbent differs from that applicable to a new entrant that has no ability to control the market. Access further objects to this request as unduly burdensome as it seeks the production of “all documents.”

24. Request for Production No. 21 states:

Please produce all documents that are identified in or support your response to BellSouth’s First Set of Interrogatories, Item No. 21.

Access has objected to this Interrogatory. Access objects to this request as irrelevant and not calculated to lead to the discovery of admissible evidence as it seeks information regarding Access’ tariffs, which are not at issue in this case. In addition, the request is irrelevant because under Florida law, which is designed to encourage nascent competition, the standard governing the regulation of the promotions and offerings of a dominant incumbent differs from that applicable to a new entrant that has no ability to control the market. Access further objects to this request as unduly burdensome as it seeks the production of “all documents.”

25. Request for Production No. 22 states:

Please produce all documents that are identified in or support your response to BellSouth's First Set of Interrogatories, Item No. 22.

Access has objected to this Interrogatory. Access objects to this request as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence as it seeks information regarding Access' tariffs, which are not at issue in this case. In addition, the request is irrelevant because under Florida law, which is designed to encourage nascent competition, the standard governing the regulation of the promotions and offerings of a dominant incumbent differs from that applicable to a new entrant that has no ability to control the market. Access further objects to this request as unduly burdensome as it seeks the production of "all documents."

23. Request for Production No. 23 states:

Please produce all documents that are identified in or support your response to BellSouth's First Set of Interrogatories, Item No. 23.

Access objects to this request as unduly burdensome as it seeks the production of "all documents."

24. Request for Production No. 24 states:

Please produce all documents that are identified in or support your response to BellSouth's First Set of Interrogatories, Item No. 24.

Access has objected to this Interrogatory. Access objects to this request as irrelevant and not calculated to lead to the discovery of admissible evidence as it seeks information that is not related to any issue in this case. Further, Access objects on the basis that the requested information is proprietary and confidential. In addition, Access objects to this request as unduly burdensome as it seeks the production of "all documents."

25. Request for Production No. 28 states:


Please produce all documents that are identified in or support your response to BellSouth's First Set of Interrogatories, Item No. 28.

Access has objected to this Interrogatory. Further, Access objects on the basis that the requested information is proprietary and confidential. In addition, Access objects to this request as unduly burdensome as it seeks the production of "all documents."

24. Request for Production No. 29 states:

Please produce all documents that are identified in or support your response to BellSouth's First Set of Interrogatories, Item No. 29.

Access has objected to this Interrogatory. Access objects to this request as irrelevant and not reasonably calculated to lead to the discovery of admissible evidence as it seeks information that is not related to any issue in this case. Further, Access objects to this request as unduly burdensome as it seeks the production of "all documents."



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Attorneys for Access Integrated
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Access Integrated Networks, Inc.'s Objections to BellSouth's First Requests for Production of Documents (Nos. 1-31) to Access Integrated Networks, Inc. has been furnished by (*) hand delivery, (**) e-mail or by U.S. Mail on this 28th day of October 2002 to the following:

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