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April 4, 2003

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03 APR -4 PM 3:37
COMMISSION
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BY HAND DELIVERY

Ms. Blanca Bayó, Director
Division of Records and Reporting
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket Nos. 981834-TP and 990321-TP

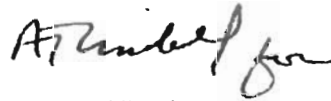
Dear Ms. Bayó:

Enclosed for filing on behalf of AT&T Communications of the Southern States, LLC are an original and fifteen copies of AT&T Communications of the Southern States, LLC's Objections to FPSC Staff's First Set of Interrogatories in the above referenced docket.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely yours,



Tracy W. Hatch

AUS
CAF
CMP
COM 5
CTR
ECR
GCL
OPC
MMS
SEC 1
OTH

TWH/amb
Enclosure

cc: Virginia C. Tate, Esq.
Parties of Record

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In

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER - DATE

03196 APR -4 8

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers)
for Commission action to support local)
competition in BellSouth)
Telecommunications, Inc.'s service)
territory)

Docket No. 981834-TP

In re: Petition of ACI Corp. d/b/a)
Accelerated Connections, Inc. for generic)
investigation to ensure that BellSouth)
Telecommunications, Inc., Sprint-Florida,)
Incorporated, and GTE Florida Incorporated)
comply with obligation to provide alternative)
local exchange carriers with flexible, timely,)
and cost-efficient physical collocation.)

Docket No. 990321-TP
Filed: April 4, 2003

**AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC'S
OBJECTIONS TO FPSC STAFF'S FIRST SET OF INTERROGATORIES**

AT&T Communications of the Southern States, LLC (hereinafter "AT&T") pursuant to Rules 25-22.034 and 25-22.035, Florida Administrative Code and Rules 1.340 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following Objections to FPSC Staff's First Set of Interrogatories to AT&T Communications of the Southern States, LLC.

The Objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the ten-day requirement set forth in Order No. PSC-02-1513-PCO-TP issued by the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced docket. Should additional grounds for objection be discovered as AT&T prepares its Responses to the above-referenced set of requests, AT&T reserves the right to supplement, revise, or modify its objections at the time that it serves its Responses on FPSC Staff. Moreover, should AT&T determine that a Protective Order is necessary

with respect to any of the material requested by FPSC Staff, AT&T reserves the right to file a motion with the Commission seeking such an order at the time that it serves its Responses on FPSC Staff.

General Objections

AT&T make the following General Objections to FPSC Staff's First Set of Interrogatories which will be incorporated by reference into AT&T's specific responses when its Responses are served on FPSC Staff.

1. AT&T objects to FPSC Staff's First Set of Interrogatories to the extent that it is overly broad, unduly burdensome, oppressive, not permitted by applicable discovery rules, and would require AT&T to disclose information which is privileged.

2. AT&T has interpreted FPSC Staff's requests to apply to AT&T's regulated intrastate operations in Florida and will limit its Responses accordingly. To the extent that any request is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission, AT&T objects to such request as irrelevant, overly broad, unduly burdensome, and oppressive.

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

4. AT&T objects to each and every request insofar as the request is 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 requests. Any Responses provided by AT&T in response to FPSC Staff's requests will be provided subject to, and without waiver of, the foregoing objection.

5. AT&T objects to each and every request insofar as the request is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. AT&T will attempt to note each instance where this objection applies.

6. AT&T objects to FPSC Staff's general instructions, definitions or specific discovery requests insofar as they seek to impose obligations on AT&T which exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

7. AT&T objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

8. AT&T objects to each and every request, general instruction, or definition insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. AT&T objects to each and every request to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that FPSC Staff's requests seek proprietary confidential business information which is not the subject of the "trade secrets" privilege, AT&T will make such information available to counsel for FPSC Staff pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

10. AT&T is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, AT&T creates countless documents that are not subject to Florida Public Service Commission or FCC retention of records requirements. These documents are kept in numerous locations and are frequently moved from site to site as employees change jobs or as the business is reorganized. Rather, these responses will provide all of the information obtained by AT&T after a reasonable and diligent search conducted in connection with this discovery request. AT&T will comply with FPSC Staff's request that a

search be conducted of those files that are reasonably expected to contain the requested information. To the extent that the discovery request purports to require more, AT&T objects on the grounds that compliance would impose an undue burden or expense.

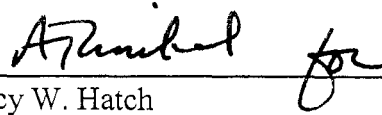
11. AT&T objects to the definitions of "AT&T" to the extent that such definitions seek to impose an obligation on AT&T Communications of the Southern States, LLC to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such definition is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. Without waiver of its general objection, and subject to other general and specific objections, Answers will be provided on behalf of AT&T Communications of the Southern States, LLC which is the entity certificated to provide regulated telecommunications services in Florida and which is a party to this docket. All references to "AT&T" in responding to FPSC Staff's requests should be taken to mean AT&T Communications of the Southern States, LLC.

12. AT&T objects to the definitions of "you" and "your" to the extent that such definitions seek to impose an obligation on AT&T Communications of the Southern States, LLC to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such definition is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. Without waiver of its general objection, and subject to other general and specific objections, Answers will be provided on behalf of AT&T Communications of the Southern States, LLC which is the entity certificated to provide regulated telecommunications services in Florida and which is a party to this docket. All references to "AT&T" in responding to FPSC Staff's requests should be taken to mean AT&T Communications of the Southern States, LLC.

SPECIFIC OBJECTIONS TO INTERROGATORIES:

AT&T's specific objections will be supplemented as needed at the time responses are due.

Respectfully submitted this 4th day of April, 2003.

A handwritten signature in black ink, appearing to read "Tracy W. Hatch", is written over a horizontal line. The signature is stylized and cursive.

Tracy W. Hatch
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Attorneys for AT&T Communications of the
Southern States, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by Hand Delivery (*) and/or U. S. Mail this 4th day of April, 2003.

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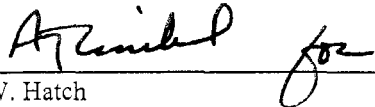
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