

ORIGINAL

McWHIRTER REEVES  
ATTORNEYS AT LAW

TAMPA OFFICE:  
400 NORTH TAMPA STREET, SUITE 2450  
TAMPA, FLORIDA 33602  
P. O. BOX 3350 TAMPA, FL 33601-3350  
(813) 224-0866 (813) 221-1854 FAX

PLEASE REPLY TO:  
TALLAHASSEE

TALLAHASSEE OFFICE:  
117 SOUTH GADSDEN  
TALLAHASSEE, FLORIDA 32301  
(850) 222-2525  
(850) 222-5606 FAX

July 7, 2003

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VIA HAND DELIVERY

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

ORIGINAL

Re: Docket No.:020507-TP

Dear Ms. Bayo:

On behalf of ACCESS Integrated Networks, Inc., enclosed for filing and distribution are the original and 15 copies of the following:

- ▶ ACCESS Integrated Networks, Inc.'s Objections to BellSouth Telecommunications, Inc.'s Second Set of Interrogatories.

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

Sincerely,

*Joe McGlothlin*  
Joseph A. McGlothlin

AUS JAM/bac  
CAF Enclosure  
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McWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, KAUFMAN & ARNOLD, P.A. 05996 JUL -7 8

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint of the Florida Competitive Carriers Association Against BellSouth Telecommunications, Inc. Regarding BellSouth's Practice of Refusing to Provide FastAccess Internet Service to Customers who Receive Voice Service from a Competitive Voice Provider, and Request for Expedited Relief

Docket No. 020507-TP

Filed: July 7, 2003

**ACCESS INTEGRATED NETWORKS, INC.'S  
OBJECTIONS TO BELL SOUTH TELECOMMUNICATIONS, INC.'S  
SECOND SET OF INTERROGATORIES**

Pursuant to Rule 28-106.206, Florida Administrative Code, and Rule 1.340, Florida Rules of Civil Procedure, ACCESS Integrated Networks, Inc. ("ACCESS") files the following objections to BellSouth Telecommunication, Inc.'s ("BellSouth") Second Set of Interrogatories. The objections stated herein are preliminary in nature and are made at this time to comply with Order No. PSC-02-1537-PCO-TL. Should additional grounds for objection be discovered as ACCESS prepares its answers, it reserves the right to supplement, revise or modify its objections at the time it serves its responses. Moreover, should ACCESS determine that a Protective Order is necessary with respect to any of the material requested by BellSouth, ACCESS reserves the right to file a motion with the Commission seeking such an order at the time that it serves its Responses on BellSouth.

**General Objections**

1. ACCESS objects to BellSouth's Second Set of Interrogatories to the extent that the interrogatories are overbroad, unduly burdensome, or are not permitted by applicable discovery rules.

2. ACCESS has interpreted BellSouth's requests to apply to ACCESS's intrastate operations in Florida and will limit its Responses accordingly. To the extent that any request is

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intended to apply to other matters, ACCESS objects to such request as irrelevant, overly broad, unduly burdensome, and oppressive.

3. ACCESS objects to each and every request and instruction to the extent that such request or instruction calls for information which is subject to the attorney-client privilege, work product privilege or other applicable privilege.

4. ACCESS objects to each and every request insofar as the request is vague, ambiguous, 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 ACCESS in response to BellSouth's requests will be provided subject to, and without waiver of, the foregoing objection.

5. ACCESS objects to BellSouth's general instructions, definitions or specific discovery requests insofar as they seek to impose obligations on ACCESS which exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

6. ACCESS 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 and/or proprietary confidential business information.

7. ACCESS's responses will provide all of the information obtained by ACCESS after a reasonable and diligent search of those files that are reasonably expected to contain the requested information. To the extent that the discovery request purports to require more, ACCESS objects on the grounds that compliance would impose an undue burden or expense.

8. ACCESS objects to these interrogatories to the extent they purport to require ACCESS to conduct an analysis or create information. ACCESS will comply with its obligations under the applicable rules of procedure.

9. ACCESS objects to any interrogatory that requires the identification 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 identified.

10. ACCESS objects to each interrogatory that is not limited in time as overly Broad and unduly burdensome.

11. ACCESS objects to interrogatories that request information that is already in BellSouth’s possession.

**Specific Objections**

With respect to Interrogatory 4(a), 4(b), 4(c), and 4(d), ACCESS incorporates general objections 7, 8 and 11 above. Notwithstanding these objections, and without waiving them, ACCESS intends to provides the responsive information that is available from ACCESS’s system.

  
\_\_\_\_\_  
Joseph A. McGlothlin  
McWhirter, Reeves, McGlothlin, Davidson,  
Decker, Kaufman & Arnold, PA  
117 South Gadsden Street  
Tallahassee, Florida 32301  
(850) 222-2525 Telephone  
(850) 222-5606 Telefax

Attorneys for Access Integrated Networks, Inc.

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Access Integrated Networks, Inc.'s Objections to BellSouth Telecommunications, Inc.'s Second Set of Interrogatories has been furnished by (\*) hand delivery, (\*\*) electronic mail, or by (\*\*\*) U.S. Mail this 7th day of July 2003, to the following:

(\*) (\*\*) Patricia Christensen  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399  
[pchriste@psc.state.fl.us](mailto:pchriste@psc.state.fl.us)

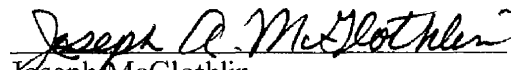
(\*\*) (\*\*\*) Nanette Edwards  
Director-Regulatory  
ITC^DeltaCom  
4092 S. Memorial Parkway  
Huntsville, Alabama 35802  
[nedwards@itcdeltacom.com](mailto:nedwards@itcdeltacom.com)

(\*) (\*\*) Nancy White  
(\*\*) Meredith Mays  
BellSouth Telecommunications, Inc.  
150 South Monroe Street, Suite 400  
Tallahassee, Florida 32301-1556  
[nwhite@bellsouth.com](mailto:nwhite@bellsouth.com)  
[mmays@bellsouth.com](mailto:mmays@bellsouth.com)

(\*\*) (\*\*\*) Donna McNulty  
MCI WorldCom Communications, Inc.  
1203 Governors Square Blvd, Suite 201  
Tallahassee, Florida 32301  
[Donna.mculty@wcom.com](mailto:Donna.mculty@wcom.com)

(\*\*) (\*\*\*) Floyd Self  
Messer, Caparello & Self  
215 South Monroe Street, Suite 701  
Tallahassee, Florida 32302-1876  
[fself@lawfla.com](mailto:fself@lawfla.com)

(\*\*) (\*\*\*) Richard Melson  
Hopping Green Sams & Smith, PA  
123 South Calhoun Street  
Tallahassee, Florida 32314  
[rmelson@hgss.com](mailto:rmelson@hgss.com)

  
Joseph McGlothlin