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July 10, 2003

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


**Re: Docket No. 020507-TL (FCCA Complaint)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Notice of Intent to Request Specified Confidential Classification for Responses to MCI's First Set of Interrogatories Item Nos. 4, 5, 7, 8, 9 and 10, 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,

  
Meredith E. Mays

Enclosure

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

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**CERTIFICATE OF SERVICE  
DOCKET NO. 020507-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and FedEx this 10<sup>th</sup> day of July 2003 to the following:

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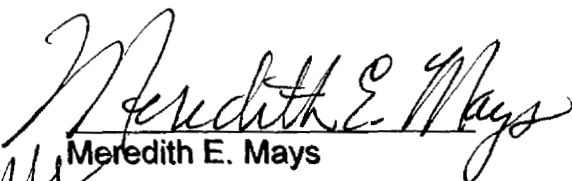
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Meredith E. Mays  


**(+) Signed Protective Agreement**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint of the Florida	)	
Competitive Carriers Association	)	Docket No. 020507-TL
Against BellSouth Telecommunications, Inc.	)	
And Request for Expedited Relief	)	Filed: July 10, 2003
_____	)	

**BELLSOUTH TELECOMMUNICATIONS, INC.'S NOTICE OF INTENT TO REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATION**

COMES NOW, BellSouth Telecommunications, Inc. ("BellSouth"), and pursuant to Rule 25-22.006, Florida Administrative Code, files its Notice of Intent to Request Specified Confidential Classification.

1. On July 10, 2003, BellSouth Telecommunications, Inc. filed its responses to MCImetro Access Transmission Services, LLC and MCI WorldCom's First Set of Interrogatories ("MCI") (Item Nos. 1 through 20) in this docket. BellSouth's responses to Interrogatory Nos. 4, 5, 7, 8, 9 and 10 include confidential business information that is considered proprietary to BellSouth.

2. Because this information contains proprietary information, BellSouth is now filing this Notice of Intent to Request Specified Confidential Classification pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, in order to allow the Commission to take possession of these responses without delay. The original of this notice has been filed with the Division of Records and Reporting, and a copy has been served on all parties of record. BellSouth will be filing a Request for Confidential Classification within 21 days of the filing of this Notice of Intent.

Respectfully submitted this 10<sup>th</sup> day of July, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint of the Florida )  
Competitive Carriers Association ) Docket No. 020507-TL  
Against BellSouth Telecommunications, Inc. )  
And Request for Expedited Relief ) Filed: July 10, 2003

**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
RESPONSES AND OBJECTIONS TO  
MCI'S FIRST SET OF INTERROGATORIES (NOS. 1 - 20)**

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 the MCI metro Access Transmission Services, LLC and MCI WorldCom's ("MCI") First Set of Interrogatories (Nos.1-20) dated June 20, 2003 referred to as "discovery".

**GENERAL OBJECTIONS**

1. BellSouth objects to the discovery to the extent that it seeks 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 is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. BellSouth objects to the discovery to the extent that it is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission. BellSouth objects to any such discovery as being irrelevant, overly broad, unduly burdensome, and oppressive.

3. BellSouth objects to the discovery to the extent that it requests information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. BellSouth objects to the discovery to the extent that it is vague, ambiguous, overly broad, imprecise, or to the extent that it utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of this discovery. Any answers provided by BellSouth in response to this discovery will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth objects to the discovery to the extent that it is 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 has already been provided.

7. BellSouth objects to the discovery to the extent that it seeks to impose obligations on BellSouth that exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

8. BellSouth objects to the discovery to the extent that responding to it would be unduly burdensome, expensive, oppressive, or excessively time consuming.

9. 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 discovery purports to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

10. BellSouth objects to any discovery request that seeks to obtain “all” of particular documents, items, or information to the extent that such requests are overly broad and unduly burdensome. Any answers provided by BellSouth in response to this discovery will be provided subject to, and without waiver of, the foregoing objection.

11. BellSouth incorporates by reference each and every objection raised in its objections to MCI’s Interrogatories 11, 12, 14, 15, 17 and 18. Any answers provided by BellSouth in response to this discovery will be provided subject to, and without waiver of, the foregoing objection.

#### **SPECIFIC RESPONSES**