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August 25, 2003

VIA FEDERAL EXPRESS

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

RECEIVED FPSC
03 AUG 25 AM 10:41
COMMISSION
CLERK

Re: Petition by AT&T Communications of the Southern States, LLC
And TCG South Florida for Arbitration of Interconnection
Agreement with Sprint-Florida, Incorporated Under the
Telecommunications Act of 1996
Docket No.: 030296-TP

Dear Mrs. Bayo:

Please find enclosed for filing in your office the original and fifteen (15) copies of AT&T Communications of the Southern States, LLC and TCG of South Florida (collectively "AT&T") Objections to Sprint-Florida, Incorporated's First Request for Production of Documents (Nos. 1-2).

Please stamp two (2) copies of the Objections in the usual manner and return to us via our courier.

If you have any questions, please do not hesitate to contact me at 404-888-7437.

Sincerely yours,

Loretta A. Cecil / LAR

Loretta A. Cecil

Enclosure(s)

AUS _____
CAF _____
CMP _____
COM _____
CTR _____
ECR _____
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OPC _____
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SEC 1
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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

07890 AUG 25 03

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Arbitration of)	
Unresolved Issues Resulting From)	Docket No.: 030296-TP
Negotiations with Sprint-Florida,)	
Inc. for Interconnection Agreement,)	
By AT&T Communications of the)	Filed: August 25, 2003
Southern States, LLC d/b/a AT&T)	
And TCG South Florida)	

AT&T OBJECTIONS TO SPRINT'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOs. 1-2)

AT&T Communications of the Southern States, LLC and TCG South Florida ("AT&T"), pursuant to Rules 25-22.034 and 25-22.035, Florida Administrative Code and Rules 1.340 and 1.280(c), Florida Rules of Civil Procedure, hereby submit the following Objections to Sprint's First Request for Production of Documents (Nos. 1-2).

I. OVERVIEW.

1. These AT&T Objections are preliminary in nature and are made for the purpose of complying with the five (5) day requirement set forth in Order No. PSC-03-0692-PCO-TP issued by the Florida Public Service Commission ("Commission") in this proceeding on June 9, 2003 and Order No. PSC-03-0920-PCO-TP dated August 11, 2003. Should additional grounds for Objections be discovered as AT&T prepares its responses, AT&T reserves the right to supplement, revise, or modify these Objections at the time that AT&T provides its responses to the Requests.

II. GENERAL OBJECTIONS.

DOCUMENT NUMBER-DATE

07890 AUG 25 8

FPSC-COMMISSION CLERK

AT&T makes the following general Objections to the Request for Production of Documents which will be incorporated by reference into AT&T's specific responses, where provided, when AT&T responds to the Request for Production of Documents.

1. AT&T objects to Sprint's First Request for Production of Documents 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 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.

3. 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 Sprint's requests will be provided subject to, and without waiver of, the foregoing objection.

4. 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.

5. AT&T objects to Sprint'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.

6. AT&T objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission or with the Federal Communications Commission ("FCC").

7. 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.

8. AT&T object 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 Sprint'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 Sprint pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

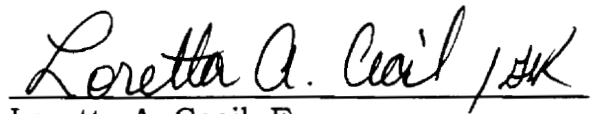
9. AT&T is a large corporation with employees located in many different locations in Florida and in other states. In the course of its

business, AT&T create 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 Sprint'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 object on the grounds that compliance would impose an undue burden or expense.

10. AT&T object 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 Sprint's requests should be taken to mean AT&T
Communications of the Southern States, LLC.

Respectfully submitted this 25th day of August, 2003.

A handwritten signature in cursive script that reads "Loretta A. Cecil" followed by a stylized flourish or initials.

Loretta A. Cecil, Esq.
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Attorney for AT&T Communications of
the Southern States, LLC and
TCG South Florida

CERTIFICATE OF SERVICE
DOCKET NO. 030296-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served electronically and U.S. Mail this 25th day of August, 2003 to the following:

AT&T
& TCG South Florida
Ms. Lisa A. Riley
1200 Peachtree Street, N.E., Ste. 8026
Atlanta, GA 30309-3579
Email: lisariley@att.com

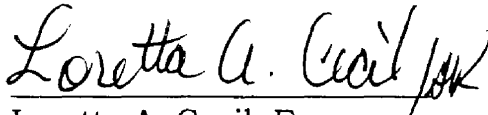
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Loretta A. Cecil, Esq.