

ORIGINAL



Tracy Hatch
Senior Attorney
Law and Government Affairs
Southern Region

Suite 700
101 N. Monroe Street
Tallahassee, FL 32301
850-425-6360

October 23, 2003

BY HAND DELIVERY

Ms. Blanca Bayó, Director
The Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

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Re: Docket No. 030852-TP

Dear Ms. Bayó:

Enclosed for filing are an original and 15 copies of AT&T Communications of the Southern States, LLC's General Objections to BellSouth's First Set of Interrogatories (Nos. 1-13) in the above-referenced docket.

Please acknowledge receipt of this letter by stamping the extra copy of this letter "filed" and returning the same to in the enclosed stamped envelope.

Thank you for your assistance with this filing.

Sincerely yours,

Tracy W. Hatch

Tracy W. Hatch

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cc: Parties of Record

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re:)
Implementation of Requirements Arising) Docket No. 030852-TP
From Federal Communications)
Commission's Triennial UNE Review;) Filed: October 23, 2003
Location-Specific Review for DS1, DS3,)
And Dark Fiber Loops, and Route-)
Specific Review for DS1, DS3, and Dark)
Fiber Transport)

AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC'S
PRELIMINARY OBJECTIONS TO BELLSOUTH'S
FIRST SET OF INTERROGATORIES (NOS. 1-13)

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 1.350 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following Preliminary Objections to BellSouth Telecommunications, Inc.'s (hereinafter "BellSouth") First Set of Interrogatories (Nos. 1-13) 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 seven (7) calendar day requirement set forth in Order No. PSC-03-1055-PCO-TP, issued in this docket on September 22, 2003, 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 November 6, 2003. Moreover, should AT&T determine that a Protective Order is necessary with respect to any of the material requested by BellSouth, 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 November 6, 2003.

General Objections

AT&T makes the following General Objections to BellSouth's First Set of Interrogatories Nos. 1-13 which will be incorporated by reference into AT&T's responses when its Responses are served on November 6, 2003.

1. AT&T objects to BellSouth's First Set of Interrogatories Nos. 1-13 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 that is privileged.

2. AT&T has interpreted BellSouth'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 BellSouth'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 BellSouth'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 or the Federal Communications Commission ("FCC").

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

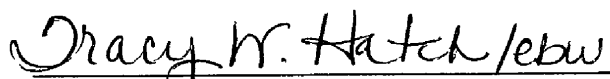
10. AT&T is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, AT&T creates countless documents that are not subject to Florida Public Service Commission or FCC retention of records requirements. These documents are kept 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 BellSouth'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 BellSouth'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 BellSouth's requests should be taken to mean AT&T Communications of the Southern States, LLC.

SUBMITTED this 23rd day of October, 2003.

Handwritten signature of Tracy W. Hatch in cursive script.

TRACY W. HATCH, ESQ.

101 N. Monroe Street

Suite 700

Tallahassee, FL 32302-1876

(850) 425-6360

Attorney for AT&T Communications of the
Southern States, LLC

**CERTIFICATE OF SERVICE
DOCKET NO. 030852-TP**

I HEREBY CERTIFY that a copy of the foregoing has been furnished via electronic mail or as indicated this 23rd day of October 2003, to the following parties of record:

<p>Adam Teitzman Office of the General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 Email: ateitzma@psc.state.fl.us (Via electronic and U.S. Mail)</p>	<p>BellSouth Telecommunications, Inc. Nancy B. White c/o Ms. Nancy H. Sims 150 South Monroe Street, Suite 400 Tallahassee, FL 32301-1556 Phone: (850) 224-7798 Fax: 222-8640 Email: nancy.sims@bellsouth.com (Via electronic and Overnight Mail)</p>
<p>Florida Cable Telecom. Assoc., Inc. Michael A. Gross 246 E. 6th Avenue, Suite 100 Tallahassee, FL 32303 Phone: 850-681-1990 Fax: 681-9676 Email: mgross@fcta.com</p>	<p><u>MCI WorldCom Communications, Inc.</u> Ms. Donna C. McNulty 1203 Governors Square Blvd., Suite 201 Tallahassee, FL 32301-2960 Phone: (850) 219-1008 Fax: 219-1018 Email: donna.mcnulty@wcom.com</p>
<p>Sprint – Florida Susan S. Masterton 1313 Blairstone Road MC: FLTLHO0107 Tallahassee, FL 32301 Phone: (850) 847-0244 Fax: 878-0777 Email: susan.masterton@mail.sprint.com</p>	<p>KMC Telecom III, LLC Marva Brown Johnson, Esq. 1755 North Brown Road Lawrenceville, GA 30043-8119 Phone: (678) 985-6261 Fax: (678) 985-6213 Email: marva.johnson@kmctelecom.com</p>
<p>Covad Communications Company Charles E. Watkins 1230 Peachtree Street, NE 19th Floor Atlanta, GA 30309 Phone: (404) 942-3492 Email: gwatkins@covad.com</p>	<p>ITC^DeltaCom Nanette Edwards 4092 South Memorial Parkway Huntsville, AL 35802 Phone: (256) 382-3856</p>
<p>McWhirter Reeves McGlothlin Davidson Kaufman & Arnold, PA Vicki Gordon Kaufman 117 South Gadsden Street Tallahassee, FL 32301 Phone: (850) 222-2525 Email: vkaufman@mac-law.com</p>	<p>Verizon Florida Inc. Mr. Richard Chapkis 201 N. Franklin Street, MCFLTC0007 Tampa, FL 33601 Phone: (813) 483-2606 Fax: (813) 204-8870 Email: richard.chapkis@verizon.com</p>
<p>Allegiance Telecom of Florida, Inc. Jeffrey J. Binder 1919 M Street, N.W. Washington, DC 20037 Phone: (202) 464-1792 Fax: (202) 464-0762 Email: Jeff.binder@algx.com</p>	<p>Allegiance Telecom, Inc. Terry Larkin 700 East Betterfield Road Washington, DC 60148 Phone: 630-522-6453 Email: terry.larkin@algx.com</p>

<p>FDN Communications Matthew Feil/Scott Kassman 390 North Orange Avenue, Suite 2000 Orlando, FL 32801-1640 Phone: (407) 835-0460 Fax: (407) 835-0309</p>	<p>Florida Competitive Carriers Assoc. C/O McWhirter Law Firm Joseph McGlothlin/Vicki Kaufman 117 S. Gadsden Street Tallahassee, FL 32301 Phone: (850) 222-2525 Fax: (850) 222-5606 email: jmcglothlin@mac-law.com/vkaufman@mac-law.com</p>
<p>MCI WorldCom Communications, Inc. (GA) De O'Roarke, Esq. Six Concourse Parkway, Suite 3200 Atlanta, GA 30328 email: de.oroark@wcom.com</p>	<p>Msser Law Firm Floyd Self/Norman Horton P. O. Box 1876 Tallahassee, FL 32302-1876 Phone: (850) 222-0720 Fax: (850) 224-4359</p>
<p>Moyle Law Firm Jon Moyle, Jr. The Perkins House 118 North Gadsden Street Tallahassee, FL 32301 Phone: (850) 681-3828 Fax: (850) 681-8788 email: jmoylejr.@moylelaw.com</p>	<p>NewSouth Communications Corp. Jake E. Jennings Two North Main Center Greenville, SC 29601-2719 Phone: (864) 672-5877 Fax: (864) 672-5313 email: jejennings@newsouth.com</p>
<p>Xspedius Communications Ms. Rabinai E. Carson 5555 Wingham Blvd., Suite 300 O'Fallon, MO 63366-3868 Phone: (301) 361-4220 Fax: (301) 361-4277 email: rabinai.Carson@xspedius.com</p>	

Tracy W. Hatch

Tracy W. Hatch, Esq.