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December 1, 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

Re: Docket Nos. 030961-TI, 030867-TL, 030868-TL, and 030869-TL

Dear Ms. Bayó:

Enclosed for filing are the original and 15 copies of AT&T's General Objections to Staff's Second Set of Interrogatories filed on behalf of AT&T Communications of the Southern States, LLC and TCG South Florida, Inc. in the above referenced Dockets.

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

Thank you for your assistance with this filing.

Sincerely yours,

*Tracy Hatch/las*  
Tracy W. Hatch

TWH/las  
Enclosure  
cc: Parties of Record

DOCUMENT NUMBER-DATE

12138 DEC-1 8

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**  
**DOCKET NOS. 030961-TI, 030867-TL, 030868-TL, & 030869-TL**

I HEREBY CERTIFY that a copy of the foregoing has been furnished via U.S.

Mail this 1<sup>st</sup> day of December, 2003, to the following parties of record:

<p>Beth Keating  Staff Counsel  Florida Public Service Commission  2540 Shumard Oak Boulevard  Tallahassee, FL 32399-0850</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</p>
<p><i>Florida Cable Telecom. Assoc., Inc.</i>  Michael A. Gross  246 E. 6th Avenue, Suite 100  Tallahassee, FL 32303  Phone: 850-681-1990  Fax: 681-9676  Email: <a href="mailto:mgross@fcta.com">mgross@fcta.com</a></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: <a href="mailto:donna.mcnulty@wcom.com">donna.mcnulty@wcom.com</a></p>
<p><i>Sprint - Florida</i>  Susan S. Masterton/Charles Rehwinkel  1313 Blairstone Road  MC: FLTLHO0107  Tallahassee, FL 32301  Phone: (850) 847-0244  Fax: 878-0777  Email: <a href="mailto:susan.masterton@mail.sprint.com">susan.masterton@mail.sprint.com</a></p>	<p>Office of Public Counsel  Charles Beck/H F. Mann  c/o The Florida Legislature  111 W. Madison St., #812  Tallahassee, FL 32399-1400  Phone: 850-488-9330</p>
<p>John Fons  Ausley &amp; McMullen, P.A.  227 South Calhoun Street  Tallahassee, FL 32302</p>	<p>Michael B. Twomey  AARP  8903 Crawfordsville Road  Tallahassee, FL 32305  Phone: (850) 421-9530  Fax: 421-8543  Email: <a href="mailto:miketwomey@talstar.com">miketwomey@talstar.com</a></p>
<p>Mark Cooper  AARP  504 Highgate Terrace  Silver Spring, MD 20904  Email: <a href="mailto:markcooper@aol.com">markcooper@aol.com</a></p>	<p><i>Verizon Florida Inc.</i>  Mr. Richard Chapkis  201 N. Franklin Street, MCFLTC0007  Tampa, FL 33601  Phone: (813) 483-2606  Fax: (813) 204-8870  Email: <a href="mailto:richard.chapkis@verizon.com">richard.chapkis@verizon.com</a></p>
<p>Messer Law Firm  Floyd Self/Norman Horton  P.O. Box 1876  Tallahassee, FL 32302-1876  Phone: 850-222-0720  Fax: 224-4359</p>	

Tracy Hatch / las

Tracy W. Hatch

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Flow-through of LEC Switched Access Reductions by IXCs, Pursuant to Section 364.163(2), Florida Statutes.

DOCKET NO. 030961-TI

In re: Petition by Verizon Florida Inc. to reform intrastate network access and basic local telecommunications rates in accordance with Section 364.164, Florida Statutes.

DOCKET NO. 030867-TL

In re: Petition by Sprint-Florida, Incorporated to reduce intrastate switched network access rates to interstate parity in revenue-neutral manner pursuant to Section 364.164(1), Florida Statutes.

DOCKET NO. 030868-TL

In re: Petition for implementation of Section 364.164, Florida Statutes, by rebalancing rates in a revenue-neutral manner through decreases in intrastate switched access charges with offsetting rate adjustments for basic services, by BellSouth Telecommunications, Inc.

DOCKET NO. 030869-TL

FILED: December 1, 2003

**AT&T'S OBJECTIONS TO FLORIDA PUBLIC SERVICE COMMISSION STAFF'S  
SECOND SET OF INTERROGATORIES (NOS. 74-87)**

AT&T Communications of the Southern States, LLC ("hereinafter "AT&T"), pursuant to the *Order Establishing Procedure*, Order No. PSC-03-0994-PCO-TL, issued September 4, 2003 by the Florida Public Service Commission ("Commission") (hereinafter "*Procedural Order*"), Rule 28-106.206 of the Florida Administrative Code, and Rules 1.280 and 1.340 of the Florida Rules of Civil Procedure, object generally to the Public Service Commission Staff (hereinafter "Staff") Second Set of Interrogatories to AT&T Communications of the Southern States, LLC, served on November 25, 2003, as described below.

## OVERVIEW

1. AT&T files these objections for purposes of complying with the five (5) day requirement set forth in the *Procedural Order*. These objections are preliminary in nature. Should additional grounds for objection be discovered as AT&T prepares its responses to any discovery, or at any time prior to hearing, AT&T reserves the right to supplement, revise, and/or modify these objections.

## GENERAL OBJECTIONS

AT&T makes the following general objections to the Interrogatories, which will be incorporated by reference into AT&T's specific responses when AT&T responds to the Interrogatories.

1. AT&T objects to Staff's Second 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 that is privileged.
2. AT&T has interpreted 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 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 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'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 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 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

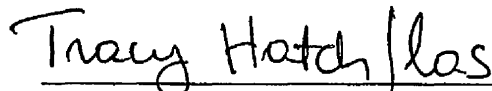
locations in Florida and in other states. In the course of its business, AT&T creates countless documents that are not subject to Florida Public Service Commission or FCC retention of records requirements. These documents are kept in numerous locations and are frequently moved from site to site as employees 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 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 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 Staff's requests should be taken to mean AT&T Communications of the Southern States, LLC.

SUBMITTED this 1<sup>st</sup> day of December, 2003.

Handwritten signature of Tracy Hatch in cursive script.

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TRACY W. HATCH, ESQ.  
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Attorney for AT&T Communications of the  
Southern States, LLC