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December 15, 2003

**BY OVERNIGHT MAIL**

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

RECEIVED- FPSC  
03 DEC 15 AM 11:00  
COMMISSION  
CLERK

Re: Docket No. 030851-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 Staff's Second Set of Interrogatories and Second Request for Production of Documents to AT&T 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 Lisa Sapper in the enclosed stamped envelope.

Thank you for your assistance with this filing.

Sincerely yours,

*Tracy Hatch/las*

Tracy W. Hatch

RECEIVED & FILED  
*Th*  
FPSC-BUREAU OF RECORDS

TWH/las  
Enclosure  
cc: Parties of Record

- AUS \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP \_\_\_\_\_
- COM \_\_\_\_\_
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- OTH \_\_\_\_\_

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12994 DEC 15 03  
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**CERTIFICATE OF SERVICE  
DOCKET NO. 030851-TP**

I HEREBY CERTIFY that a copy of the foregoing has been furnished via electronic mail or as indicated this 15<sup>th</sup> day of December 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</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: <a href="mailto:nancy.sims@bellsouth.com">nancy.sims@bellsouth.com</a></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: <a href="mailto:mgross@fcta.com">mgross@fcta.com</a></p>	<p>MCI WorldCom Communications, Inc. * 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.mculty@wcom.com">donna.mculty@wcom.com</a></p>
<p>Sprint – Florida* Susan S.Masterton 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>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: <a href="mailto:marva.johnson@kmctelecom.com">marva.johnson@kmctelecom.com</a></p>
<p>Covad Communications Company* Charles E. Watkins 1230 Peachtree Street, NE 19<sup>th</sup> Floor Atlanta, GA 30309 Phone: (404) 942-3492 Email: <a href="mailto:g Watkins@covad.com">g Watkins@covad.com</a></p>	<p>ITC^DeltaCom * Nanette Edwards 4092 South Memorial Parkway Huntsville, AL 35802 Phone: (256) 382-3856</p>
<p>McWhirter Reeves McGlothlin Davidson* Kaufman &amp; Arnold, PA Vicki Gordon Kaufman 117 South Gadsden Street Tallahassee, FL 32301 Phone: (850) 222-2525 Email: <a href="mailto:vkaufman@mac-law.com">vkaufman@mac-law.com</a></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: <a href="mailto:richard.chapkis@verizon.com">richard.chapkis@verizon.com</a></p>
<p>Allegiance Telecom of Florida, Inc. Charles V. Gerkin, Jr. 9201 North Central Expressway Dallas, TX 75231 Phone: (469) 259-4051 Fax: 770-234-5965 Email: <a href="mailto:charles.gerkin@algx.com">charles.gerkin@algx.com</a></p>	<p>Allegiance Telecom, Inc. Terry Larkin 700 East betterfield Road Washington, DC 60148 Phone: 630-522-6453 Email: <a href="mailto:terry.larkin@algx.com">terry.larkin@algx.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>	<p>MCI WorldCom Communications, Inc.(GA) * De O'Roark, Esq. Six Concourse Parkway, Suite 600 Atlanta, GA 30328 Email: <a href="mailto:de.oroark@wcom.com">de.oroark@wcom.com</a></p>

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<p>Moyle Law Firm (Tall)  Jon Moyle, Jr.  The Perkins House  118 North Gadsden Street  Tallahassee, FL 32301  Phone: (850) 681-3828  Fax: 681-8788  Email: <a href="mailto:jmoylejr@moylelaw.com">jmoylejr@moylelaw.com</a></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: <a href="mailto:jejennings@newsouth.com">jejennings@newsouth.com</a></p>
<p>BellSouth Telecommunications, Inc.*  R. Douglas Lackey  675 W. Peachtree Street, Suite 4300  Atlanta, GA 30375</p>	<p>Supra Telecommunications and Info. Systems  Jorge Cruz-Bustillo  2620 S.W. 27<sup>th</sup> Avenue  Miami, FL 33133  Phone: (305) 476-4252  Fax: (305) 443-1078  Email: <a href="mailto:Jorge.cruz-bustillo@stis.com">Jorge.cruz-bustillo@stis.com</a></p>
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<p>Matthew Feil  FDN Communications  390 North Orange Avenue  Suite 2000  Orlando, FL 32801  (407) 835-0460  <a href="mailto:mfeil@mail.fdn.com">mfeil@mail.fdn.com</a></p>	<p>Scott A. Kassman  FDN Communications  390 North Orange Avenue  Suite 2000  Orlando, FL 32801  (407) 447-6636  <a href="mailto:skassman@mail.fdn.com">skassman@mail.fdn.com</a></p>

*Tracy Hatch*

Tracy W. Hatch

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

**In Re: Implementation of Requirements)**  
**Arising From Federal Communications ) Docket No.: 030851-TP**  
**Commission Triennial UNE Review: )**  
**Local Circuit Switching for Mass ) Filed: December 15, 2003**  
**Market Customers )**  
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**AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC'S**  
**OBJECTIONS TO FLORIDA PUBLIC SERVICE COMMISSION STAFF'S**  
**SECOND SET OF INTERROGATORIES (Nos. 8-11)**

AT&T Communications of the Southern States, LLC (hereinafter "AT&T"), pursuant to the *Order Establishing Procedure*, Order No. PSC-03-1054-PCO-TP, issued September 22, 2003, and *Second Order on Procedure*, Order No. PSC-03-1265-PCO-TP (hereinafter collectively "*Procedural Orders*"), issued November 7, 2003 by the Florida Public Service Commission (hereinafter "Commission"), Rule 28-106.206 of the Florida Administrative Code, and Rules 1.280 and 1.340 of the Florida Rules of Civil Procedure, hereby submits the following objections to Florida Public Service Commission Staff's (hereinafter "FPSC Staff") Second Set of Interrogatories to AT&T Communications of the Southern States, LLC.

**OVERVIEW**

AT&T files these objections for purposes of complying with the seven (7) day requirement set forth in the *Procedural Orders*. 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.

DOCUMENT NUMBER-DATE

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## **GENERAL OBJECTIONS**

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

A. AT&T objects to the FPSC Staff's Second Set of Interrogatories to AT&T to the extent that the Interrogatories are overly broad, unduly burdensome, irrelevant, oppressive and not reasonably calculated to lead to the discovery of admissible evidence pursuant to the *Procedural Orders*, Rule 28-106.206 of the Florida Administrative Code, and Rules 1.280 and 1.340 of the Florida Rules of Civil Procedure.

B. AT&T objects to the FPSC Staff's Second Set of Interrogatories to AT&T to the extent that the Interrogatories purport to seek discovery of information protected by attorney/client privilege, the accountant/client privilege, the work product doctrine or any other applicable privilege.

C. AT&T objects to the FPSC Staff's Second Set of Interrogatories to AT&T to the extent that the Interrogatories purport to seek discovery of information and/or materials containing the mental impressions, conclusions, opinions or legal theories of any attorney or other representative of AT&T concerning the subject of the proceeding and prepared and developed in anticipation of litigation pursuant to Rule 1.280(b)(3) of the Florida Rules of Civil Procedure.

D. AT&T objects to the FPSC Staff's Second Set of Interrogatories to AT&T to the extent that the Interrogatories purport to impose discovery obligations on AT&T inconsistent with, or beyond the scope of, what is permitted under the *Procedural Orders* and applicable Florida law.

E. AT&T objects to the FPSC Staff's Second Set of Interrogatories to AT&T to the extent that the Interrogatories purport to seek discovery of matters other than those subject to the jurisdiction of the Commission pursuant to the FCC's Triennial Review Order, Florida Administrative Code and Florida Statutes.

F. AT&T objects to the FPSC Staff's Second Set of Interrogatories to AT&T to the extent that the Interrogatories purport to seek disclosure of information that is proprietary confidential information or a "trade secret" without the issuance of an appropriate Protective Order or Confidential Classification as outlined by the *Procedural Orders*, §364.183 of the Florida Statutes, §90-506 of the Florida Statutes, and Rule 25-22.006.

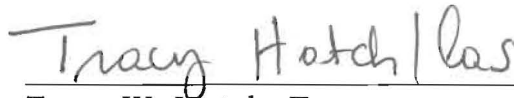
G. AT&T objects to all Interrogatories which require the disclosure

of information which already is in the public domain or otherwise on record with the Commission or the FCC.

H. AT&T objects to the FPSC Staff's Second Set of Interrogatories to AT&T to the extent that the Interrogatories seek information and discovery of facts known and opinions held by experts acquired and/or developed in anticipation of litigation or for hearing and outside the scope of discoverable information pursuant to Rule 1.280(4) of the Florida Rules of Civil Procedure.

I. Pursuant to the *Procedural Orders*, the Triennial Review Order, Rule 28-106.206 of the Florida Administrative Code, and Rules 1.280 and 1.340 of the Florida Rules of Civil Procedure, to the extent that FPSC Staff's Second Set of Interrogatories request specific financial, business or proprietary information regarding AT&T's economic business model, AT&T objects to providing or producing any such information on the grounds that those Interrogatories presume that the market entry analysis is contingent upon AT&T's economic business model instead of the hypothetical business model contemplated by the Triennial Review Order.

Respectfully submitted, this the 15<sup>th</sup> day of December, 2003.



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