

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re:)
) Docket No. 000475-TP
Complaint by BellSouth Telecommunications, Inc.)
against Thrifty Call, Inc. regarding practices in the) Filed: March 21, 2008
reporting of percent interstate usage for compensa-)
tion for jurisdictional access services)

**THRIFTY CALL, INC.'S OBJECTIONS TO AT&T FLORIDA'S
FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS**

Thrifty Call, Inc. ("Thrifty Call"), by and through undersigned counsel and pursuant to Florida Public Service Commission Order No. PSC-07-1027-PCO-TP, hereby files its objections to BellSouth Telecommunications, Inc. d/b/a AT&T Florida's ("AT&T") Fourth Request for Production of Documents. These objections are preliminary in nature and should additional grounds for objections be discovered by Thrifty Call through its preparation of these responses, Thrifty Call reserves the right to supplement, revise, or modify its objections at the time responses are served.

GENERAL OBJECTIONS AND RESERVATION OF RIGHTS

1. Any document production shall be made without waiving or intending to waive, but on the contrary intending to preserve and preserving: (a) the right to object, on the grounds of competency, relevancy, materiality, privilege or admissibility as evidence for any purpose, or any other ground, to the use of the documents produced or the subject thereof, in this or any subsequent or other proceeding; and (b) the right to object on any ground to other document requests, interrogatories or other discovery proceedings involving or relating to the subject matter of the Request.

DOCUMENT NUMBER-DATE

02129 MAR 21 08

FPSC-COMMISSION CLERK

2. Thrifty Call will make a reasonable effort to respond to each and every individual Request for Production (“Request”) that is not subject to a Specific Objection as Thrifty Call understands and interprets such Request. If AT&T should assert an interpretation of any Request that differs from Thrifty Call’s, Thrifty Call reserves the right to supplement or amend its Specific Objections.

3. Thrifty Call objects to each and every one of the requests for documents that calls for information protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, the trade secret privilege, the consulting expert privilege, third-party confidentiality agreements or protective order, or any other applicable privilege or protection afforded by law, whether such privilege or protection appears at the time response is first made or is later determined to be applicable for any reason. Thrifty Call in no way intends to waive such privilege or protection, subject to the executed Agreement.

4. Thrifty Call objects to providing information that is proprietary, confidential business information without provisions in place to protect the confidentiality of the information. Thrifty Call has not had sufficient time in every case to determine whether the discovery requests call for the disclosure of confidential information. However, if it so determines, it will either file a motion for protective order requesting confidential classification and procedures for protection or take other actions to protect the confidential information requested. Thrifty Call in no way intends to waive claims of confidentiality, subject to the executed Agreement.

5. Where Thrifty Call states herein that it will produce or has produced documents in accordance with the Florida Rules of Civil Procedure, it will produce such documents to the extent that they exist and can be reasonably obtained.

13. Thrifty Call expressly reserves and does not waive any and all objections it may have to the admissibility, authenticity or relevancy of the documents produced pursuant to the Requests.

14.. The information and documents supplied herein are for use in this litigation and for no other purpose.

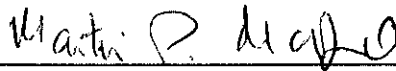
15. Any inadvertent production of any document shall not be deemed or construed to constitute a waiver of any privilege or right, and Thrifty Call reserves its right to demand the return of any such document and all copies thereof.

16. Thrifty Call objects to the Requests to the extent that they seek the production of documents that are not within Thrifty Call's possession, custody, or control.

OBJECTIONS TO DEFINITIONS

17. Thrifty Call objects to the definition of "document" on the grounds that it is vague, ambiguous, overly broad, and unduly burdensome. Thrifty Call also objects to this definition to the extent that it exceeds the requirements of the Florida Rules of Civil Procedure.

Respectfully submitted,



KENNETH A. HOFFMAN, ESQUIRE
MARTIN P. MCDONNELL, ESQUIRE
Rutledge, Ecenia, Purnell & Hoffman, P.A.
215 South Monroe Street, Ste. 420
P.O. Box 551
Tallahassee, FL 32302
850-681-6788 (telephone)
850-681-6515 (telecopier)
Ken@reuphlaw.com
Marty@reuphlaw.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by electronic and U.S. Mail to the following this 21 day of March, 2008:

Charlene Poblete
Rick Mann
Nancy Pruitt
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Tracy W. Hatch
Manuel Gurdian
AT&T Florida Legal Department
150 West Flagler Street, Suite 1910
Miami, Florida 33130

John T. Tyler
Suite 4300, AT&T Midtown Center
675 W. Peachtree Street, NE
Atlanta, GA 30375

E. Earl Edenfield, Jr.
c/o Greg Follensbee
150 S. Monroe Street, Suite 400
Tallahassee, Florida 32301



MARTIN P. MCDONNELL, ESQ.