



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL  
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In re: Resolution of petition(s) )  
to establish nondiscriminatory )  
rates, terms, and conditions for )  
resale involving local exchange )  
companies and alternative local )  
exchange companies pursuant to )  
Section 364.161, Florida Statutes )

Docket No. ~~950984-TP~~  
Docket No. 950984A-TP (MFS)  
Docket No. 950984B-TP (MCImetro)  
Served: January 4, 1996

AT&T'S ANSWERS, OBJECTIONS, AND MOTION FOR PROTECTIVE  
ORDER WITH RESPECT TO BELL SOUTH TELECOMMUNICATIONS, INC.'S  
FIRST SET OF INTERROGATORIES

AT&T Communications of the Southern States, Inc. (hereinafter "AT&T"), pursuant to Rules 25-22.034 and 25-22.035, Florida Administrative Code and Rules 1.340 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following Answers, Objections, and Motion for Protective Order with respect to BellSouth Telecommunications, Inc.'s (hereinafter "BellSouth") First Set of Interrogatories to AT&T Communications of the Southern States, Inc. dated December 14, 1995.

OBJECTIONS AND MOTION FOR PROTECTIVE ORDER

Pursuant to the terms of Order No. PSC-95-1083-PCO-TP issued by the Florida Public Service Commission ("Commission") in the above-referenced docket on August 30, 1995, AT&T served its Objections to BellSouth's First Set of Interrogatories on December 26, 1995. A copy of such Objections is attached hereto and incorporated herein by specific reference thereto. AT&T's objections are submitted pursuant to the authority contained in Slatnick v. Leadership Housing Systems of Florida, Inc., 368 So.2d 79 (Fla. 3d DCA 1979). To the extent that a Motion for Protective Order is required, the

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objections attached hereto and incorporated herein by specific reference thereto are to be construed as a request for a protective order.

**ANSWERS TO SPECIFIC INTERROGATORIES**

Subject to and without waiver of its General Objections, Specific Objections, or Motion for Protective Order, AT&T submits the following Answers to specific interrogatories.

**AT&T'S ANSWERS, OBJECTIONS AND MOTION  
FOR PROTECTIVE ORDER WITH RESPECT TO  
BELLSOUTH'S FIRST SET OF INTERROGATORIES  
DATED DECEMBER 14, 1995  
DOCKET NO. 950984-TP, 950984A-TP, 950984B-TP**

**INTERROGATORY NO. 1**

Has AT&T been a party to any unbundling/resale dockets in states other than Florida?

**RESPONSE:**

Yes.

**The above response is made in accordance with and subject to AT&T's  
Objections which were served on BellSouth on December 26, 1995.**

Provided by:           G. R. Follensbee, Director  
                          AT&T  
                          1200 Peachtree Street, NE  
                          Atlanta, Georgia 30309

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**INTERROGATORY NO. 2:**

If the answer to Interrogatory No. 1 is affirmative, provide the following information:

- (a) the name(s) of the state(s) or jurisdictions in which AT&T appeared as a party in such dockets;
- (b) the official name of the proceeding, including any docket numbers or other information necessary to fully describe the docket;
- (c) the date any order was rendered in such docket;
- (d) if an order was rendered, state whether it was for an interim/temporary or permanent resolution of the issues addressed herein;
- (e) if an order was rendered, when it was implemented, or if not yet implemented, when it is to be implemented;
- (f) state the financial arrangements ordered;
- (g) state the technical arrangements ordered;
- (h) describe each network element, function, or capability ordered to be unbundled and the rate for each such element, function, or capability, if not provided in response to an earlier interrogatory;
- (i) state whether the local exchange company was ordered to directly connect the entities (i.e., alternative local exchange companies) colocated in the local exchange company's office, with each other as opposed to connecting through the local exchange company's facilities;
- (j) state the total number of access lines in each state;
- (k) state whether the order identified above, if any, has been the subject of a judicial appeal and, if so, the identity of the court, the case number, the current status of the appeal, and the basis of the appeal;

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- (l) identify any person who either prepared testimony, prepared and filed testimony, or who gave testimony on AT&T's behalf in the proceedings referred to in response to this interrogatory;
- (m) describe, by title or content, or alternatively by date and jurisdiction, the testimony, if written, given in the dockets identified in this interrogatory by these persons identified in (l) above.

**RESPONSE:**

(a) Georgia, North Carolina, South Carolina

(b) Georgia - Docket No. 5958-U, Interconnection, Unbundling, and Resale of Telecommunications Services

North Carolina - Docket No. P-100, SUB 133, Local Exchange and Local Exchange Access Telecommunications Competition

South Carolina - Docket No. 93-036-C, Generic Proceeding to Review Intrastate Open Network Architecture (ONA) Services

(c) BellSouth is a party to each of the three dockets identified in (b), and thus is in possession of all relevant information pertaining to these dockets.

(d) BellSouth is a party to each of the three dockets identified in (b), and thus is in possession of all relevant information pertaining to these dockets.

(e) BellSouth is a party to each of the three dockets identified in (b), and thus is in possession of all relevant information pertaining to these dockets.

(f) BellSouth is a party to each of the three dockets identified in (b), and thus is in possession of all relevant information pertaining to these dockets.

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- (g) BellSouth is a party to each of the three dockets identified in (b), and thus is in possession of all relevant information pertaining to these dockets.
- (h) BellSouth is a party to each of the three dockets identified in (b), and thus is in possession of all relevant information pertaining to these dockets.
- (i) BellSouth is a party to each of the three dockets identified in (b), and thus is in possession of all relevant information pertaining to these dockets.
- (j) This information is in the possession of the incumbent local exchange companies. AT&T thus is unable to respond to the request.
- (k) BellSouth is a party to each of the three dockets identified in (b), and thus is in possession of all relevant information pertaining to these dockets.
- (l) BellSouth is a party to each of the three dockets identified in (b), and thus is in possession of all relevant information pertaining to these dockets.
- (m) BellSouth is a party to each of the three dockets identified in (b), and thus is in possession of all relevant information pertaining to these dockets.

**The above responses are made in accordance with and subject to AT&T's  
Objections which were served on BellSouth on December 26, 1995.**

Provided by: G. R. Follensbee, Director  
AT&T  
1200 Peachtree Street, NE  
Atlanta, Georgia 30309

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**INTERROGATORY NO. 3:**

**Has AT&T reached an agreement, either oral or in writing, concerning unbundling/resale with any local exchange companies in states other than Florida, whether in a formal docketed matter or otherwise?**

**RESPONSE:**

No.

**The above response is made in accordance with and subject to AT&T's Objections which were served on BellSouth on December 26, 1995.**

Provided by: **G. R. Follensbee, Director  
AT&T  
1200 Peachtree Street, NE  
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**INTERROGATORY NO. 4:**

If your response to Interrogatory No. 3 is affirmative, provide the following information:

- (a) the identify of the parties to such an agreement;
- (b) the date such an agreement was signed, or otherwise became effective;
- (c) the date such agreement is to be implemented, or if already implemented, the date of implementation;
- (d) a summary of the terms and conditions of such agreement. Including the rates for any unbundled offerings or for any services to be resold;
- (e) a listing of each network function, element or capability to be unbundled and the rate therefore, if not previously provided;
- (f) if reduced to writing, identify the agreement by either a description or title in sufficient detail such that the document can be requested for production;

**RESPONSE:**

Not applicable.

**The above response is made in accordance with and subject to AT&T's  
Objections which were served on BellSouth on December 26, 1995.**

Provided by: G. R. Follensbee, Director  
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**INTERROGATORY NO. 5:**

**Has AT&T agreed to or been directed to offer for resale or unbundling, any of its own facilities to third parties for any purpose, including the offering of competitive services?**

**RESPONSE:**

**Yes.**

**Provided by: G. R. Follensbee, Director  
AT&T  
1200 Peachtree Street, NE  
Atlanta, Georgia 30309**

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**INTERROGATORY NO. 6:**

If the answer to Interrogatory No. 5 is affirmative, and the agreement or order was reduced to writing, please describe such agreements or orders with enough detail so that the writing can be requested for production.

**RESPONSE:**

AT&T's resale and unbundling offers are contained in its intrastate tariffs which are on file with the Commission.

Provided by:           G. R. Follensbee, Director  
                          AT&T  
                          1200 Peachtree Street, NE  
                          Atlanta, Georgia 30309

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**INTERROGATORY NO. 7:**

Does AT&T have any internal policy or position concerning the resale or unbundling of its own facilities?

**RESPONSE:**

**Consistent with AT&T's objections served on BellSouth on December 26, 1995, AT&T objects to this interrogatory on the grounds that the information requested is irrelevant, overly broad, unduly burdensome, and oppressive.**

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**INTERROGATORY NO. 8:**

If the answer to Interrogatory No. 7 is affirmative, please describe such policy or position in detail and, if such policy or position is reduced to writing, please describe the written document with sufficient detail to allow it to be requested for production.

**RESPONSE:**

**Consistent with AT&T's objections served on BellSouth on December 26, 1995, AT&T objects to this interrogatory on the grounds that the information requested is irrelevant, overly broad, unduly burdensome, and oppressive.**

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**INTERROGATORY NO. 9:**

If not provided in response to an earlier interrogatory, please identify every jurisdiction where:

- (a) AT&T is authorized to provide local exchange services;
- (b) whether, in such jurisdictions, AT&T provides service over its own facilities or by using resold or unbundled facilities or by using some combination of its own and resold or unbundled facilities;
- (c) identify in detail, including rates paid, the types or kind of unbundled facilities, or resold services that AT&T uses, in each jurisdiction, i.e., resold residential service, unbundled local loops, etc.

**RESPONSE:**

- (a) AT&T is not authorized to provide local exchange services in any of its service territories. However, AT&T has an application pending in Georgia.
- (b) Not applicable
- (c) Not applicable

**The above responses are made in accordance with and subject to AT&T's Objections which were served on BellSouth on December 26, 1995.**

Provided by: G. R. Follensbee, Director  
AT&T  
1200 Peachtree Street, NE  
Atlanta, Georgia 30309

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**INTERROGATORY NO. 10:**

**If AT&T uses resold tariffed services in the jurisdictions where it provides local service, does it receive a discount from the provider of the resold service?**

**RESPONSE:**

Not applicable.

**The above response is made in accordance with and subject to AT&T's  
Objections which were served on BellSouth on December 26, 1995.**

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**INTERROGATORY NO. 11:**

If the answer to Interrogatory No. 10 is affirmative, for each type or kind of service resold, please:

- (a) state the basis for the discount;
- (b) state whether the discount allows the resale of the service on a profitable basis.

**RESPONSE:**

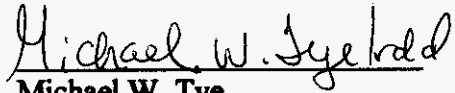
Not applicable.

**The above response is made in accordance with and subject to AT&T's  
Objections which were served on BellSouth on December 26, 1995.**


Provided by: G. R. Follensbee, Director  
AT&T  
1200 Peachtree Street, NE  
Atlanta, Georgia 30309



SUBMITTED this 4th day of January, 1996.



Michael W. Tye  
106 East College Ave.  
Suite 1410  
Tallahassee, FL 32301  
(904) 425-6360



Robin D. Dunson  
1200 Peachtree St., NE  
Promenade I, Room 4038  
Atlanta, Georgia 30309  
(404) 810-8689

ATTORNEYS FOR AT&T  
COMMUNICATIONS OF THE  
SOUTHERN STATES, INC.

**AFFIDAVIT**

**STATE OF GEORGIA  
COUNTY OF FULTON**

**BEFORE ME**, the undersigned authority, personally appeared **GREG R. FOLLENSBEE**, who deposed and stated that he provided the answers to Interrogatories Nos. 1, 2, 3, 4, 5, 6, 9, 10 and 11, of BellSouth Telecommunications, Inc.'s First Set of Interrogatories to AT&T Communications of the Southern States, Inc. ("AT&T"), served on AT&T in Docket Nos. 950984-TP, 950984A-TP and 950984B-TP and that the responses are true and correct to the best of his information and belief.

**DATED AT** Atlanta, Georgia, this 4th day of January, 1996.

  
\_\_\_\_\_  
Signature of Affiant

**SWORN TO AND SUBSCRIBED** before me this 4th day of January, 1996.

**NOTARY PUBLIC**

State of Georgia

My Commission Expires: Sara K. Burrow, Notary Public  
~~My Commission Expires September 9, 1999~~

  
\_\_\_\_\_  
Signature of Notary Public