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ORIGINAL
FILE COPY

August 5, 1996

Mrs. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

ACK _____

WFA _____

APP _____

CAF _____

CMU *Career*

DTR _____

EAG _____

LEG 1

LIN 5

OPC _____

RCH _____

SEC 1

WAS _____

OTH _____

RE: Docket No. 960786-TL

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Objections to Florida Interexchange Carriers Association's Third Set of Interrogatories. Please file these documents in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served on the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White (BL)

Nancy B. White

Enclosures

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
W. J. Ellenberg

RECEIVED & FILED

FLORIDA BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

08184 AUG-5 96

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
DOCKET NO. 960786-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express this 5th day of August, 1996 to the following:

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Nancy B White (SL)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL
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In re: Consideration of BellSouth)
Telecommunications, Inc. entry)
into InterLATA services pursuant) Docket No. 960786-TL
to Section 271 of the Federal)
Telecommunications Act of 1996) Filed: August 5, 1996
_____)

BELLSOUTH TELECOMMUNICATIONS, INC.'S OBJECTIONS
TO FLORIDA INTEREXCHANGE CARRIERS ASSOCIATION'S
THIRD SET OF INTERROGATORIES

COMES NOW, BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), 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 Objections to Florida Interexchange Carriers Association's ("FIXCA") Third Set of Interrogatories to BellSouth.

The Objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the ten-day requirement set forth in Order No. PSC-96-0945-PCO-TP issued by the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced docket on July 19, 1996. Should additional grounds for objection be discovered as BellSouth prepares its Answers to the above-referenced set of interrogatories, BellSouth reserves the right to supplement, revise, or modify its objections at the time that it serves its Answers on FIXCA. Moreover, should BellSouth determine that a Protective Order is necessary with respect to any of the material requested by FIXCA, BellSouth reserves the right to file a motion with the Commission seeking such an order at the time that it serves its Answers on FIXCA.

GENERAL OBJECTIONS

BellSouth makes the following General Objections to FIXCA's Third Set of Interrogatories which will be incorporated by reference into BellSouth's specific responses when its Answers are served on FIXCA.

1. BellSouth objects to the interrogatories to the extent that such interrogatories seek to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such requests are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. BellSouth has interpreted FIXCA's interrogatories to apply to BellSouth's regulated intrastate operations in Florida and will limit its Answers accordingly. To the extent that any interrogatory is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission, BellSouth objects to such interrogatory as irrelevant, overly broad, unduly burdensome, and oppressive.

3. BellSouth objects to each and every interrogatory and instruction to the extent that such interrogatory 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. BellSouth objects to each and every interrogatory 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 interrogatories. Any Answers provided by BellSouth in response to FIXCA's interrogatories will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth objects to each and every interrogatory 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. BellSouth will attempt to note each instance where this objection applies.

6. BellSouth object to FIXCA's discovery requests, instructions and definitions, insofar as they seek to impose obligations on BellSouth which exceed the requirements of the Florida Rules of Civil Procedure or Florida law, particularly Instruction (X).

7. BellSouth objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

8. BellSouth objects to each and every interrogatory, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. BellSouth objects to each and every interrogatory to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that FIXCA's interrogatories request proprietary confidential business information which is not subject to the "trade secrets" privilege, BellSouth will make such information available to counsel for FIXCA pursuant to an appropriate Protective Agreement, subject to any other general or

specific objections contained herein.

OBJECTIONS TO SPECIFIC INTERROGATORIES

Subject to, and without waiver of, the foregoing general objections, BellSouth enters the following specific objections with respect to FIXCA's interrogatories:

INTERROGATORY NOS. 46 AND 47: Pursuant to the General Objections stated above, BellSouth objects to these interrogatories on the grounds that they seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence related to the issue of whether BellSouth has met or will be able to meet the requirements of Section 271 of the Telecommunications Act of 1996. The quantifiable amount of competition is irrelevant under the Act, because, for example, Section 271(c) contemplates interLATA relief without a single competitor.

INTERROGATORY NO. 48: Pursuant to the General Objections stated above, BellSouth objects to this request on the grounds that the request is overly broad, is not time specific, not sufficiently specific to answer, and, therefore, burdensome and oppressive.

INTERROGATORY NO. 50: Pursuant to the General Objections stated above, BellSouth objects to this request on the grounds that this Commission has issued Order No. PSC-96-0959-FOF-TP which deals with the subject of the request. BellSouth will comply with the terms of that Order. FIXCA is merely attempting to get another "bite at the apple." Moreover, BellSouth objects to this request on the grounds

that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence related to the issue of whether BellSouth has met or will be able to meet the requirements of Section 271(c) of the Telecommunications Act of 1996. In addition, the Commission approved agreements in Florida are a matter of public record.

INTERROGATORY NO. 51: Pursuant to the General Objections stated above, BellSouth objects to this request on the grounds that the request seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence related to the issues in this docket. Moreover, the request is overly broad and, therefore, burdensome and oppressive. Much of the information requested is a matter of public record.

INTERROGATORY NO. 52: Pursuant to the General Objections stated above, BellSouth objects to these interrogatories on the grounds that they seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence related to the issue of whether BellSouth has met or will be able to meet the requirements of Section 271 of the Telecommunications Act of 1996.

Respectfully submitted this 5th day of August, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.

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ROBERT G. BEATTY

J. PHILLIP CARVER

c/o Nancy H. Sims

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