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August 12, 1996

Mrs. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Docket No. 96-100-EP

Dear Mrs. Bayo:

Enclosed for filing in the above referenced docket are an original and fifteen (15) copies of AT&T's Objections to BellSouth Telecommunications, Inc.'s First Set of Interrogatories.

Copies of the foregoing are being served on all parties of record in accordance with the attached Certificate of Service.

Yours truly,
Tracy Hatch
Tracy Hatch

Attachments

cc: J. P. Spooner, Jr.
Parties of Record

- ACK
- AFA _____
- APP _____
- CAF _____
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by AT&T)
Communications of the Southern) DOCKET NO. 960833-TP
States, Inc., for arbitration)
with BellSouth) SERVED: August 12, 1996
Telecommunications, Inc.)
concerning interconnection and)
resale under the)
Telecommunications Act of 1996.)
_____)

AT&T'S OBJECTIONS TO BELLSOUTH 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 Objections
to BellSouth Telecommunications, Inc.'s (hereinafter "BellSouth")
First Set of Interrogatories to AT&T Communications of the Southern
States, Inc.

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-96-0933-PCO-TP issued by the
Florida Public Service Commission (hereinafter the "Commission") in
the above-referenced docket on July 17, 1996. Should additional
grounds for objection be discovered as AT&T prepares its Answers to
the above-referenced set of interrogatories, AT&T reserves the

right to supplement, revise, or modify its objections at the time that it serves its Answers on BellSouth. Moreover, should AT&T determine that a Protective Order is necessary with respect to any of the material requested by BellSouth, AT&T reserves the right to file a motion with the Commission seeking such an order at the time that it serves its Answers on BellSouth.

General Objections

AT&T makes the following General Objections to BellSouth's First Set of Interrogatories which will be incorporated by reference into AT&T's specific responses when its Answers are served on BellSouth.

1. AT&T objects to the following provisions of the "Definitions" section of BellSouth's First Set of Interrogatories:

Paragraph 1: 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, Inc. 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, Inc. which is the interexchange carrier (hereinafter "IXC") certificated to provide regulated telecommunications services in Florida and which is a party to this docket. All references to "AT&T" in responding to BellSouth's interrogatories should be taken to mean AT&T Communications of the Southern States, Inc.

2. Unless otherwise indicated, AT&T has interpreted BellSouth's interrogatories to apply to AT&T'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, AT&T objects to such interrogatory as irrelevant, overly broad, unduly burdensome, and oppressive.

3. AT&T 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. AT&T 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 AT&T in response to

BellSouth's interrogatories will be provided subject to, and without waiver of, the foregoing objection.

5. AT&T 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. AT&T will attempt to note each instance where this objection applies.

6. AT&T objects to BellSouth'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 objects to each and every interrogatory, 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 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 BellSouth's interrogatories request proprietary confidential business information which is not subject to the "trade secrets" privilege, AT&T will make such information available to counsel for BellSouth 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, AT&T enters the following specific objections with respect to BellSouth's interrogatories:

No. 1: To the extent that the requested information has not been provided to BellSouth during the course of negotiations and included in AT&T's filing with the Commission, AT&T objects to this interrogatory on the grounds that the interrogatory is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Moreover, this interrogatory is overly broad, unduly burdensome, oppressive, and seeks information that is subject to attorney/client, work product, and trade secrets privileges. The scope this proceeding is to determine the obligations of BellSouth pursuant the Telecommunications Act of 1996 to provide interconnection and resale of services to enable entry into the local exchange market. AT&T's plans to enter the local exchange market and any information related thereto are not within the scope of this proceeding.

NO. 2: Same objection as Interrogatory No. 1.

NO. 7: Same objection as Interrogatory No. 1.

NOs. 10, 11, 12, 13(d), 14(d), and 17: AT&T objects to this

interrogatory on the grounds that the request seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Moreover, the request is overly broad, unduly burdensome, oppressive, and seeks information that is subject to the trade secrets privilege and that is beyond the scope of this proceeding.

NO. 18: AT&T objects to this interrogatory on the grounds that the request seeks information that is neither relevant nor calculated to lead to the discovery of admissible evidence. Moreover the request is overly broad, unduly burdensome, oppressive and is beyond the scope of this proceeding.

NOs. 20 and 21: Same objection as Interrogatory 10.

NOs. 22, 23, 24, 26, 28, 29, 30, 32, 33, 34, 35, and 36: AT&T objects to these Interrogatories on the grounds that the requests seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Moreover, the request is overly broad, unduly burdensome, oppressive, and seeks information that is subject to attorney/client, work product and trade secrets privileges and is beyond the scope of this proceeding.

NOs. 37, 38, and 39: AT&T objects on the grounds that the request seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible

evidence. Moreover, the request is overly broad, unduly burdensome, oppressive, and seeks information that is subject to the attorney/client and work product privileges and is beyond the scope of this proceeding.

NOs. 40, 41 and 42: AT&T objects on the grounds that the request seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Moreover, the request is overly broad, unduly burdensome, oppressive, and seeks information that is subject to the attorney/client, work products, and trade secrets privileges and is beyond the scope of this proceeding.

NO. 46: AT&T objects on the grounds that the request seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Moreover, the request is overly broad, unduly burdensome, oppressive, and seeks information that is subject to the attorney/client, work product, and trade secrets privileges and is beyond the scope of this proceeding.

NOs. 47, 48, 49, 50, 51, 52, 53, 54, 55, 60, and 61: Same objection as Interrogatory No. 46.

NO. 62: AT&T's reasons for requesting the level of discounts set forth in the Interrogatory are fully explained in its prefiled testimony which had been served on BellSouth in this docket. AT&T objects to the remainder of the request on the

same grounds set forth in its objection to Interrogatory No. 46.

NO. 64: To the extent that BellSouth defines "network interface" as a point of physical connection between the facilities of AT&T and BellSouth, BellSouth already possesses this information in its own records. To the extent that the term "network interface" is intended to mean anything other than a point of physical connection between the facilities of BellSouth and AT&T, then AT&T seeks clarification as to the information sought.

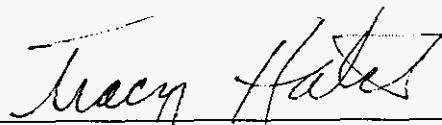
NOs. 66, 67, 68, 69, 70, and 71: Same objection as Interrogatory No. 46.

NOs. 72, 73, 74, 75, 76, 77, 78 and 79: AT&T will limit its response to cases filed pursuant to the arbitration provisions of the Telecommunications Act of 1996. AT&T objects to the remainder of the Interrogatory on the grounds that the request seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Moreover the remainder of the request seeks information that is unduly burdensome, overly broad, and oppressive, and beyond the scope of this proceeding.

NO. 93: Same objection as Interrogatory No. 46.

NO. 102: Same objection as Interrogatory No. 46.

SUBMITTED this 12th day of August, 1996.

A handwritten signature in cursive script that reads "Tracy Hatch". The signature is written in dark ink and is positioned above a horizontal line.

Tracy Hatch
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ATTORNEY FOR AT&T COMMUNICATIONS
OF THE SOUTHERN STATES, INC.

CERTIFICATE OF SERVICE

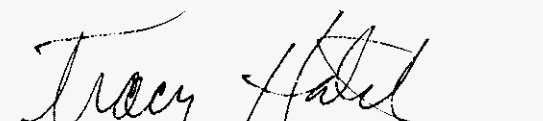
DOCKET NOS. 960833-TP and 960846-TP

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand-delivery to the following parties of record this 12th day of August, 1996:

BellSouth Telecommunications
c/o Nancy H. Sims
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Florida Public Service Comm.
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