

ORIGINAL

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December 2, 1997

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

RE: Docket Nos. 960833-TP, 960846-TP, 960757-TP,  
960916-TP and 971140-TP

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Objections to AT&T's Third Request for Production of Documents. 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,

*Bennett L. Ross* (ke)

Bennett L. Ross

- ACK 4
- AFA 4
- APP
- CAF
- CMU
- CTR
- EAG
- LEG 3
- LIN
- OPC
- RCH
- SEC 1
- WAS
- OTH

Enclosures

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

RECEIVED FILED  
*[Signature]*  
DIV. OF RECORDS

DOCUMENT NUMBER-DATE

12276 DEC-25

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petitions by AT&T	)	Docket No. 960833-TP
Communications of the Southern	)	
States, Inc., and MCI	)	Docket No. 960846-TP
Telecommunications Corporation,	)	
MCI Metro Access Transmission	)	
Services, Inc., for arbitration	)	
of certain terms and conditions	)	
of a proposed agreement with	)	
BellSouth Telecommunications,	)	
Inc. concerning interconnection	)	
and resale under the	)	
Telecommunications Act of 1996	)	
	)	
In the matter of	)	Docket No. 960757-TP
	)	
MFS Communications Company, Inc.	)	
	)	
Petition for Arbitration Pursuant	)	
to 47 U.S.C. § 252(b) of	)	
Interconnection Rates, Terms, and	)	
Conditions with	)	
	)	
BellSouth Telecommunications, Inc.	)	
	)	
In the Matter of	)	Docket No. 960916-TP
Petition by American	)	
Communications Services, Inc.	)	
and American Communications	)	
Services of Jacksonville, Inc.	)	
for Arbitration with BellSouth	)	
Telecommunications, Inc.	)	
pursuant to the	)	
Telecommunications Act of 1996	)	
	)	
In re: Petition by MCI Metro Access	)	Docket No. 971140-TP
Transmission Services, Inc., to Set	)	
Non-Recurring Charges for	)	
Combination of Network Elements	)	
to Set Non-Recurring Charges for	)	
Combination of Network Elements	)	
with BellSouth Telecommunications, Inc.)	)	
	)	

**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
 OBJECTIONS TO AT&T'S THIRD  
REQUEST FOR PRODUCTION OF DOCUMENTS**

DOCUMENT NUMBER-DATE

12276 DEC-25

FPSC-REGISTRATION REPORTING

BellSouth Telecommunications, Inc., ("BellSouth" or "Company"), pursuant to Rule 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 AT&T Communications of the Southern States, Inc.'s ("AT&T") Third Request for Production of Documents.

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 the procedural order issued by the Florida Public Service Commission ("Commission") in the above-referenced dockets. Should additional grounds for objection be discovered as BellSouth prepares its Answers to the above-referenced set of requests, BellSouth reserves the right to supplement, revise, or modify its objections at the time that it serves its Answers on AT&T. Moreover, should BellSouth determine that a Protective Order is necessary with respect to any of the material requested by AT&T, BellSouth reserves the right to file a motion with the Commission seeking such an order at the time that it serves its Answers on AT&T.

#### **GENERAL OBJECTIONS**

BellSouth makes the following General Objections to AT&T's Third Request for Production of Documents which will be incorporated by reference into BellSouth's specific responses when its Answers are served on AT&T.

1. BellSouth objects to the requests to the extent that such requests 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 AT&T's requests to apply to BellSouth's regulated operations in Florida and will limit its Answers accordingly. To the extent that any request is intended to apply to matters other than Florida operations subject to the jurisdiction of the Commission, BellSouth objects to such request to produce as irrelevant, overly broad, unduly burdensome, and oppressive.

3. BellSouth objects to each and every request and instruction to the extent that such request 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 request 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 requests. Any Answers provided by BellSouth in response to AT&T's request will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth objects to each and every request 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 objects to AT&T's discovery requests, instructions and definitions, insofar as they seek to impose obligations on BellSouth that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

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 request, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. BellSouth objects to each and every request to the extent that the information requested constitute "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that AT&T's requests proprietary confidential business information which is not subject to the "trade secrets" privilege, BellSouth will make such information available to counsel for AT&T pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

10. BellSouth is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, BellSouth creates countless documents that are not subject to Florida Public Service Commission or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not

every document has been provided in response to these discovery requests. Rather, these responses provide all of the information obtained by BellSouth after a reasonable and diligent search conducted in connection with this discovery request. BellSouth has complied with AT&T's request that a search be conducted of those files that are reasonably expected to contain the requested information. To the extent that the discovery request purports to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

Respectfully submitted this 2nd day of December, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

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**CERTIFICATE OF SERVICE**  
**DOCKET NOS. 960833-TP/960846-TP/960757-TP/960916-TP/971140-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by  
Federal Express this 2nd day of December, 1997 to the following:

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