

RECEIVED 0730

08 AUG 25 PM 1998



Tracy Hatch  
Attorney

RECEIVED  
August 25, 1998

Suite 700  
101 N. Monroe St.  
Tallahassee, FL 32301  
904 425-6364  
FAX: 904 425-6361

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

RE: Dockets No. 980696-TP

Dear Mrs. Bayo:

Enclosed for filing in the above referenced dockets is AT&T of the Southern States, Inc.'s (AT&T) Objections to Staff's First Request for Production of Documents, First Request for Production of Documents Jointly to AT&T and MCI, First Set of Interrogatories and First Set of Interrogatories Jointly to AT&T and MCI in the above captioned docket.

Sincerely,

Tracy Hatch

RECEIVED & FILED

FPSC BUREAU OF RECORDS

Enclosures

cc: All Parties of Record

- ACK \_\_\_\_\_
- FA 4
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- FAG \_\_\_\_\_
- LEG 2
- LIN 5
- OJC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1
- ...

**CERTIFICATE OF SERVICE  
DOCKET 980696-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via \*hand delivery/\*\*Federal Express and U.S. Mail to the following parties of record on this 25th day of August, 1998:

William Cox  
Florida Public Service  
Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Richard Melson  
Hopping Law Firm  
Post Office Box 6526  
Tallahassee, FL 32314

Jack Shreve  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street  
Room 812  
Tallahassee, FL 32399-1400

Kimberly Caswell\*\*  
GTE Service Incorporated  
1 Tampa City Center  
201 N. Franklin Street  
Tampa, FL 33602

Carolyn Marek  
VP of Regulatory Affairs  
Southeast Region  
Time Warner Communications  
Nashville, TN 37221

Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter, Reeves,  
McGlothlin, Davidson, Rief &  
Bakas, P.A.  
117 S. Gadsden Street  
Tallahassee, FL 32301

Floyd R. Self  
Messer, Caparello & Self,  
P.A.  
215 S. Monroe Street  
Suite 701  
Tallahassee, FL 32301-1876

Brian Sulmonetti  
WorldCom, Inc.  
1515 S. Federal Highway  
Suite 400  
Boca Raton, FL 33432

Nancy B. White  
Robert G. Beatty  
c/o Nancy Sims  
150 S. Monroe Street  
Suite 400  
Tallahassee, FL 32301

Norman H. Horton, Jr.  
Messer, Caparello & Self,  
P.A.  
215 S. Monroe Street  
Suite 701  
Tallahassee, FL 32301-1876

James C. Falvey  
e.spire Communications,  
Inc.  
133 National Business  
Parkway  
Suite 200  
Annapolis Junction, MD  
20701

Laura L. Gallagher  
Vice President-Regulatory  
Affairs  
Florida Cable  
Telecommunications  
Association  
310 N. Monroe Street  
Tallahassee, FL 32301

Harriet Eudy  
ALLTELL Florida, Inc.  
Post Office Box 550  
Live Oak, FL 32060

John P. Fons  
J. Jeffrey Wahlen  
Ausley & McMullen  
227 South Calhoun Street  
Tallahassee, FL 32302

David B. Erwin  
127 Riversink Road  
Crawfordville, FL 32327

Robert M. Post, Jr.  
Post Office Box 277  
Indiantown, FL 34956

Mark Ellmer  
Post Office Box 220  
502 Fifth Street  
Port St. Joe, FL 32456

Tom McCabe  
Post Office Box 189  
Quincy, FL 32353-0189

Lynn B. Hall  
Vista-United  
Telecommunications  
Post Office Box 10180  
Lake Buena Vista, FL 32830

Lynne G. Brewer  
Northeast Florida Telephone  
Co.  
Post Office Box 485  
Macclenny, FL 32063-0485

Kelly Goodnight  
Frontier Communications  
180 S. Clinton Avenue  
Rochester, NY 14646

Patrick Knight Wiggins  
Donna L. Canzano  
Wiggins & Villacorta, P.A.  
Post Office Drawer 1657  
Tallahassee, FL 32302

Steve Brown  
Intermedia Communications  
Inc.  
3625 Queen Palm Drive  
Tampa, FL 33619-1309

Michael A. Gross  
Assistant Attorney General  
Office of the Attorney  
General  
PL-01, the Capitol  
Tallahassee, FL 32399-1050

Charles J. Rehwinkel  
Sprint-Florida, Inc.  
1313 Blairstone Rd.  
Tallahassee, FL 32301

Kenneth A. Hoffman  
John R. Ellis  
Rutledge, Ecenia, Underwood  
Purnell & Hoffman  
Post Office Box 551  
Tallahassee, FL 32301

Paul Kouroupas  
Michael McRae  
Teleport Communications  
Group, Inc.  
2 Lafayette Centre  
1133 21<sup>st</sup> Street, NW  
Suite 400  
Washington, DC 20036

Suzanne F. Summerlin  
1311-B Paul Russell Road  
Suite 201  
Tallahassee, FL 32301

Peter M. Dunbar  
Barbara D. Auger  
Pennington, Moore,  
Wilkinson, Bell & Dunbar  
P.O. Box 10095  
Tallahassee, FL 32302

*Tracy L. H.*  
ATTORNEY

In re: Determination of the ) DOCKET NO. 980696-TP  
 cost of basic local )  
 telecommunications service, ) DATED: August 25, 1998  
 pursuant to Section 364.025, )  
 Florida Statutes. )

**AT&T'S OBJECTIONS TO THE STAFF OF THE  
 FLORIDA PUBLIC SERVICE COMMISSION'S  
 FIRST SET OF INTERROGATORIES TO AT&T AND MCI JOINTLY**

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 the Staff of the Florida Public Service Commission's (Staff's) First Set of Interrogatories to AT&T Communications of the Southern States, Inc. and MCI Telecommunications Corporation and MCIMETRO Access Transmission Services, Inc. (MCI).

The Objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the five-day requirement set forth in Order No. PSC-98-0813-PCO-TP issued by the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced docket on June 19, 1998. 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 Staff. Moreover, should AT&T determine that a Protective Order is necessary with respect to any of the material requested by Staff, 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 Staff.

#### General Objections

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

1. AT&T objects to the following provisions of the Staff's First Joint Set of Interrogatories to the extent that such interrogatories 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. In particular, AT&T objects to the implication that AT&T is being required to respond on behalf of MCI. While MCI and AT&T are jointly sponsoring the testimony of certain witnesses, MCI is not affiliated or associated with AT&T in

any way. 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 entity certificated to provide regulated telecommunications services in Florida and which is a party to this docket. All references to "AT&T" in responding to Staff's request for production should be taken to mean AT&T Communications of the Southern States, Inc.

2. Unless otherwise indicated, AT&T has interpreted Staff'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

ly AT&T in response to Staff'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 Staff'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 Staff'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 STAFF 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 Staff's interrogatories:

INTERROGATORY NO. 1: Without waiver, AT&T will provide the requested information in its possession custody or control.

INTERROGATORY NO. 2: Without waiver, AT&T will provide the requested information in its possession custody or control.

INTERROGATORY NO. 3: See response to Interrogatory No. 2.

INTERROGATORY NO. 4: See response to Interrogatory No. 2.

INTERROGATORY NO. 5: See response to Interrogatory No. 2.

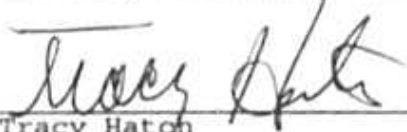
INTERROGATORY NO. 6: See response to Interrogatory No. 2.

INTERROGATORY NO. 7: See response to Interrogatory No. 2.

INTERROGATORY NO. 8: See response to Interrogatory No. 2.

INTERROGATORY NO. 9: See response to Interrogatory No. 2.

SUBMITTED this 25th day of August, 1998.

  
\_\_\_\_\_  
Tracy Hatch  
101 N. Monroe St.  
Suite 700  
Tallahassee, FL 32301  
(904) 425-6364

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