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March 20, 2006

BY ELECTRONIC FILING

Ms. Blanca Bayó, Director
The Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 050119/050125-TP

Dear Ms. Bayó:

Attached please AT&T's Notice of Serving Responses to Staff's Second Set of Interrogatories (14 - 17) in the above-referenced docket. Pursuant to the Commission's Electronic Filing Requirements, this version should be considered the official copy for purposes of the docket file. Copies of this document will be served on all parties via electronic and U.S. Mail.

Thank you for your assistance with this filing.

Sincerely yours,

s/ Tracy W. Hatch

Tracy W. Hatch

TWH/scd
Attachment
cc: Parties of Record

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Joint petition by TDS Telecom d/b/a TDS Telecom/Quincy Telephone; ALLTEL Florida, Inc.; Northeast Florida Telephone Company d/b/a NEFCOM; GTC, Inc. d/b/a GT Com; Smart City Telecommunications, LLC d/b/a Smart City Telecom; ITS Telecommunications Systems, Inc.; and Frontier Communications of the South, LLC ["Joint Petitioners"] objecting to and requesting suspension and cancellation of proposed transit traffic service tariff filed by BellSouth Telecommunications, Inc. DOCKET NO. 050119-TP

In re: Petition and complaint for suspension and cancellation of Transit Traffic Service Tariff No. FL2004-284 filed by BellSouth Telecommunications, Inc., by AT&T Communications of the Southern States, LLC. DOCKET NO. 050125-TP DATED: March 20, 2006

AT&T OF THE SOUTHERN STATES LLC'S NOTICE OF SERVING OBJECTIONS AND RESPONSES TO STAFF'S SECOND SET OF INTERROGATORIES (NOS. 14-17)

NOTICE IS HEREBY GIVEN that a true and correct copy of AT&T Communications of the Southern States, LLC's Responses to Staff's Second Set of Interrogatories (Nos. 14 - 17) to AT&T, which were served by Staff on February 24, 2006, was sent via U.S. mail to all parties to this docket on this date.

Respectfully submitted on 20th day of March 2006.

s/Tracy W. Hatch
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Attorney for AT&T Communications of the Southern States, LLC

CERTIFICATE OF SERVICE
DOCKET NOS. 050119 and 050125-TP

I HEREBY CERTIFY that a copy of the foregoing has been furnished via U.S. Mail this 20th day of March 2006, the following parties of record:

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Tracy Hatch
Tracy Hatch

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Joint petition by TDS Telecom d/b/a TDS Telecom/Quincy Telephone; ALLTEL Florida, Inc.; Northeast Florida Telephone Company d/b/a NEFCOM; GTC, Inc. d/b/a GT Com; Smart City Telecommunications, LLC d/b/a Smart City Telecom; ITS Telecommunications Systems, Inc.; and Frontier Communications of the South, LLC ["Joint Petitioners"] objecting to and requesting suspension and cancellation of proposed transit traffic service tariff filed by BellSouth Telecommunications, Inc. DOCKET NO. 050119-TP

In re: Petition and complaint for suspension and cancellation of Transit Traffic Service Tariff No. FL2004-284 filed by BellSouth Telecommunications, Inc., by AT&T Communications of the Southern States, LLC. DOCKET NO. 050125-TP
DATED: March 20, 2006

AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC'S RESPONSES TO STAFF'S SECOND SET OF INTERROGATORIES (NOS. 14 – 17)

AT&T Communications of the Southern States, LLC (hereinafter "AT&T"), pursuant to the *Order Establishing Procedure*, Order No. PSC-05-1206-PCO-TP, issued December 6, 2005 (hereinafter "*Procedural Order*"), Rule 28-106.206 of the Florida Administrative Code, and Rules 1.280 and 1.340 of the Florida Rules of Civil Procedure, submits the following Objections and Responses to Florida Public Service Commission Staff's (hereinafter "FPSC Staff") Second Set of Interrogatories to AT&T Communications of the Southern States, LLC. as follows:

GENERAL OBJECTIONS

AT&T makes the following general objections to the FPSC Staff's Second Set of Interrogatories to AT&T as follows.

A. AT&T objects to the FPSC Staff's Second Set of Interrogatories to AT&T to the extent that the Interrogatories are overly broad, unduly burdensome, irrelevant, oppressive and not reasonably calculated to lead to the discovery of admissible evidence pursuant to the

Procedural Orders, Rule 28-106.206 of the Florida Administrative Code, and Rules 1.280 and 1.340 of the Florida Rules of Civil Procedure.

B. AT&T objects to the FPSC Staff's Second Set of Interrogatories to AT&T to the extent that the Interrogatories purport to seek discovery of information protected by attorney/client privilege, the accountant/client privilege, the work product doctrine or any other applicable privilege.

C. AT&T objects to the FPSC Staff's Second Set of Interrogatories to AT&T to the extent that the Interrogatories purport to seek discovery of information and/or materials containing the mental impressions, conclusions, opinions or legal theories of any attorney or other representative of AT&T concerning the subject of the proceeding and prepared and developed in anticipation of litigation pursuant to Rule 1.280(b)(3) of the Florida Rules of Civil Procedure.

D. AT&T objects to the FPSC Staff's Second Set of Interrogatories to AT&T to the extent that the Interrogatories purport to impose discovery obligations on AT&T inconsistent with, or beyond the scope of, what is permitted under the *Procedural Orders* and applicable Florida law.

E. AT&T objects to the FPSC Staff's Second Set of Interrogatories to AT&T to the extent that the Interrogatories purport to seek discovery of matters other than those subject to the jurisdiction of the Commission pursuant to Florida Administrative Code and Florida Statutes.

F. AT&T objects to the FPSC Staff's Second Set of Interrogatories to AT&T to the extent that the Interrogatories purport to seek disclosure of information that is proprietary confidential information or a "trade secret" without the issuance of an appropriate Protective Order or Confidential Classification as outlined by the *Procedural Orders*, §364.183 of the Florida Statutes, §90-506 of the Florida Statutes, and Rule 25-22.006.

G. AT&T objects to all Interrogatories which require the disclosure of information which already is in the public domain or otherwise on record with the Commission or the FCC.

Subject to the foregoing and without waiver, AT&T hereby responds as follows:

RESPONSES:

INTERROGATORY NO. 14: If the FPSC determines that it should establish the specific terms and conditions to address the scenario outlined in Issue 5, what specific terms and conditions would AT&T recommend the FPSC adopt?

RESPONSE:

The FPSC should not establish the specific terms and conditions that govern the relationship between an originating carrier and the terminating carrier, where BellSouth is providing transit service and the originating carrier is not interconnected with, and has no interconnection agreement with, the terminating carrier. It is up to the parties to determine the type of reciprocal compensation arrangement and appropriate terms and conditions of their relationship.

INTERROGATORY NO. 15: If the FPSC determines that it should establish the specific terms and conditions to address the scenario outlined in Issue 8, what specific terms and conditions would AT&T recommend the FPSC adopt?

RESPONSE:

The FPSC should not unilaterally establish the terms and conditions that govern the relationship between BellSouth and a terminating carrier, where BellSouth is providing transit service and the originating carrier is not interconnected with, and has no interconnection agreement with, the terminating carrier. The negotiated interconnection agreement between the parties should govern. The law requires the originating carrier to pay the terminating carrier and the transit provider is not responsible for payment to the terminating carrier.

INTERROGATORY NO. 16: If the FPSC determines that it should establish the specific terms and conditions to address the scenario outlined in Issue 9, what specific terms and conditions would AT&T recommend the FPSC adopt?

RESPONSE:

The FPSC should not unilaterally establish the terms and conditions of transit traffic between the transit service provider and the Small LECs that originate and terminate transit traffic. Existing law already provides for the originating carrier, when utilizing a tandem transit provider to deliver its traffic to another carrier for termination should compensate the transiting provider and the terminating provider.

INTERROGATORY NO. 17: Please refer to the rebuttal testimony of AT&T's witness Guepe, page 4, lines 14- 23. Please identify the docket number the Northeast Florida Telephone Company and New Cingular Wireless agreement was filed in.

RESPONSE:

Docket No. 050843

Respectfully submitted,

s/ Tracy W. Hatch

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Attorney for AT&T COMMUNICATIONS OF
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