

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by AT&T Communications of)
the Southern States, Inc. for arbitration)
of certain terms and conditions of a proposed)
agreement with GTE Florida, Incorporated)
concerning interconnection and resale under)
the Telecommunications Act of 1996.)
_____)

Docket No. 960847-TP

Filed: September 19, 1996

AT&T'S OBJECTIONS TO STAFF'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-13)

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 1.350 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following Objections to the Staff of the Florida Public Service Commission's (hereinafter "Staff") First Request for Production of Documents (Nos. 1 - 13) 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-96-1053-PCO-TP issued by the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced docket on August 16, 1996. Should additional grounds for objection be discovered as AT&T prepares its Responses to the above-referenced set of requests, AT&T reserves the right to supplement, revise, or modify its objections at the time that it serves its Responses 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 Responses on Staff.

General Objections

AT&T makes the following General Objections to Staff's First Set of Requests for Production of Documents which will be incorporated by reference into AT&T's specific responses when its Responses are served on Staff.

1. AT&T objects to paragraph 1 of the "Definitions" section of Staff's First Set of Requests for Production of Documents (Nos. 1- 13) to the extent that the definitions of "you", "your", "Company" or "AT&T" 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, Responses will be provided on behalf of AT&T Communications of the Southern States, Inc. which is the interexchange carrier (hereinafter "IXC") and alternative local exchange carrier (hereinafter "ALEC") 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 requests for production of documents should be taken to mean AT&T Communications of the Southern States, Inc.

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

3. AT&T 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. AT&T 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 Responses provided by AT&T in response to Staff's requests will be provided subject to, and without waiver of, the foregoing objection.

5. AT&T 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. 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 request, 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 request 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 requests seek proprietary confidential business information which is not the subject of 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.

10. AT&T is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, AT&T 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 and 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 AT&T after a reasonable and diligent search conducted in connection with this discovery request. AT&T has complied with Staff'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, AT&T objects on the grounds that compliance would impose an undue burden or expense.

SUBMITTED this 19th day of September, 1996.



Robin D. Dunson
1200 Peachtree St., NE
Promenade I, Room 4038
Atlanta, Georgia 30309
(404) 810-8689

Tracy Hatch
Michael W. Tye
101 N. Monroe St.
Suite 700
Tallahassee, FL 32301
(904) 425-6364

Mark Logan, Esq.
Bryant, Miller & Olive
201 South Monroe Street
Suite 500
Tallahassee, Florida 32301
(904) 222-8611

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

CERTIFICATE OF SERVICE

DOCKET NO: 960847-TP

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by Overnight mail to the following parties of record this 18th day of September, 1996.

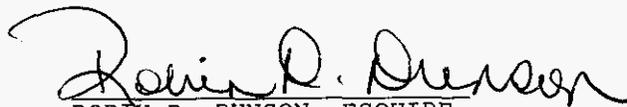
GTE Florida Incorporated
Beverly Y. Menard
Mr. Ken N. Waters
106 East College Ave.
Suite 1440
Tallahassee, Florida 32301-7704

GTE Mobile Communications
c/o Rutledge Law Firm
Kenneth Hoffman, Esquire
215 South Monroe Street
Suite 420
Tallahassee, FL 32301

Hopping Law Firm
Richard Melson, Esq.
123 South Calhoun Street
Tallahassee, Florida 32301

MCI Metro Access Transmiss.
Services, Inc.
Martha P. McMillin, Esq.
780 Johnson Ferry Road
Suite 700
Atlanta, Georgia 30342

Florida Public Service Commission
Donna L. Canzano
Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850



ROBIN D. DUNSON, ESQUIRE
AT&T COMMUNICATIONS OF THE
SOUTHERN STATES, INC.
1200 Peachtree Street, N.E.
Promenade 1, Room 4038
Atlanta, Georgia 30309