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September 21, 1998

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

Dear Mrs. Bayo:

Re: Docket No. 980696-TP

You will find enclosed for filing in the above-referenced docket an original and fifteen (15) copies of AT&T's Objections to BellSouth's First Set of Interrogatories to AT&T; AT&T's Objections to BellSouth's Third Request for Production of Documents to AT&T; AT&T's Objections to Staff's Fourth Request for Production of Documents to AT&T and AT&T's Fourth Set of Interrogatories to AT&T.

Copies of the foregoing are being served on the parties of record in accordance with the attached certificate of service.

Yours truly,

Tracy Hatch
Tracy Hatch

ACK _____
AFA 2
APP _____
CAF _____ JH/mr
CMU _____ Enclosures
CTR _____ cc: Parties of Record

EAG _____
LEG 2
LIN 5
OPC _____
RCH _____
SEC 1
WAS _____
OTH _____

4th POD
DOCUMENT NO.
10401-48
9-21-98

Obj. to BS 1st Set
DOCUMENT NUMBER-DATE
10398 SEP 21 98
FPSC RECORDS/REPORTING

BS's 3rd POD
DOCUMENT NUMBER-DATE
10399 SEP 21 98
FPSC RECORDS/REPORTING

FPSC's 4th
DOCUMENT NUMBER-DATE
10400 SEP 21 98
FPSC RECORDS/REPORTING

In re: Determination of the
cost of basic local
telecommunications service,
pursuant to Section 364.025,
Florida Statutes.

DOCKET NO. 980696-TP

DATED: September 21, 1998

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

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 BellSouth Telecommunications, Inc.'s (hereinafter "BELLSOUTH")
Third Request for Production of Documents 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 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 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 BELLSOUTH. Moreover, should AT&T determine

DOCUMENT NUMBER-DATE

10399 SEP 21 98

FPSC-RECORDS/REPORTING

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 Responses on BELLSOUTH.

General Objections

AT&T makes the following General Objections to BELLSOUTH's Third 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 BELLSOUTH.

1. AT&T objects to BELLSOUTH's Third Set of Requests for Production of Documents to the extent that it is overly broad, unduly burdensome, oppressive, not permitted by applicable discovery rules, and would require AT&T to disclose information which is privileged.

2. AT&T has interpreted BELLSOUTH'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 BELLSOUTH'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 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 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 BELLSOUTH'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 BELLSOUTH 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. Rather, these responses will provide all of the information obtained by AT&T after a reasonable and diligent search conducted in connection with this discovery request. AT&T will comply with BELLSOUTH'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.

Objections to Specific Requests

Subject to, and without waiver of, the foregoing general objections, AT&T enters the following specific objections with respect to BELLSOUTH's requests:

Request No. 4: Without waiver, AT&T will provide the requested information in its possession custody or control subject to a determination of confidentiality by AT&T and the execution of an appropriate protective agreement.

Request No. 5: Without waiver, AT&T will provide the requested information in its possession custody or control subject to a determination of confidentiality by AT&T and the execution of an appropriate protective agreement.

Request No. 6: Without waiver, AT&T will provide the requested information in its possession custody or control subject to a determination of confidentiality by AT&T and the execution of an appropriate protective agreement.

Request No. 7: Without waiver, AT&T will provide the requested information in its possession custody or control subject to a determination of confidentiality by AT&T and the execution of an appropriate protective agreement.

SUBMITTED this 21st day of September, 1998.

Tracy Hatch
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(904) 425-6364

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

**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 21st day of September, 1998:

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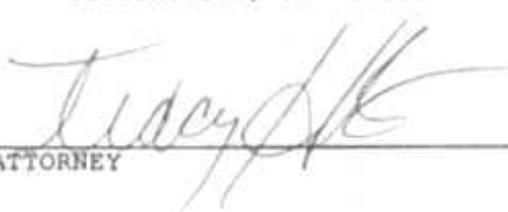
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