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March 5, 1996

VIA HAND DELIVERY

ORIGINAL
FILE COPY

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

Re: Docket No. 950985-TP

- ACK
- AFA
- APP 1
- CAF
- CMD Chase
- CTR
- EAG
- LEG 1
- LIN 5
- OPC
- RCH
- SEC 1
- WAS
- OTH

Dear Mrs. Bayo:

Enclosed for filing in the above-referenced docket are an original and fifteen (15) copies of AT&T's Responses, Objections, and Motion for Protective Order, and Notice of Service, with Respect to Sprint United/Centel's First Request for Production of Documents. Also enclosed for filing are an original and fifteen (15) copies of AT&T's Answers, Objections, and Motion for Protective Order with Respect to to Sprint United/Centel's First Set of Interrogatories.

An extra copy of each is included. Please date stamp the extra copies and return in the enclosed self-addressed envelope.

Yours truly,

Robin D. Dunson

RECEIVED & FILED

EPSC-BUREAU OF RECORDS

Enclosures

cc: J. P. Spooner, Jr.
Parties of Record

POD
DOCUMENT NUMBER-DATE
02656 MAR-5 88
FPSC-RECORDS/REPORTING

Inter
DOCUMENT NUMBER-DATE
02655 MAR-5 88
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL
FILE COPY

In re: Resolution of petition(s))
to establish nondiscriminatory)
rates, terms, and conditions for)
interconnection involving local)
exchange companies and alternative)
local exchange companies pursuant)
to Section 364.162, Florida)
Statutes)
_____)

Docket No. 950985-TP

(Continental/Time Warner/MFS--
Sprint United/Centel & GTE)

Filed: March 5, 1996

**AT&T'S ANSWERS, OBJECTIONS, AND MOTION FOR PROTECTIVE
ORDER WITH RESPECT TO SPRINT UNITED/CENDEL'S
FIRST SET OF INTERROGATORIES**

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 Answers, Objections, and Motion for Protective Order with respect to Central Telephone Company of Florida and United Telephone Company of Florida's (hereinafter collectively referred to as "SPRINT UNITED/CENDEL") First Set of Interrogatories to AT&T served February 14, 1996.

OBJECTIONS AND MOTION FOR PROTECTIVE ORDER

Pursuant to the terms of Order No. PSC-95-1084-PCO-TP issued by the Florida Public Service Commission ("Commission") in the above-referenced docket on August 30, 1995, AT&T served its Objections to SPRINT UNITED/CENDEL's First Set of

DOCUMENT NUMBER-DATE

02655 MAR-5 1996

FPSC-RECORDS/REPORTING

AT&T'S ANSWERS, OBJECTIONS AND MOTION FOR
PROTECTIVE ORDER WITH RESPECT TO
SPRINT UNITED/CENDEL'S FIRST SET OF INTERROGATORIES
DATED FEBRUARY 13, 1996
DOCKET NO. 950985-TP

Interrogatories on February 26, 1996. A copy of such Objections is attached hereto and incorporated herein by specific reference thereto. AT&T's objections are submitted pursuant to the authority contained in Slatnick v. Leadership Housing Systems of Florida, Inc., 368 So.2d 79 (Fla. 3d DCA 1979). To the extent that a Motion for Protective Order is required, the objections attached hereto and incorporated herein by specific reference thereto are to be construed as a request for a protective order.

ANSWERS TO SPECIFIC INTERROGATORIES

Subject to and without waiver of its General Objections, Specific Objections, or Motion for Protective Order, AT&T submits the following Answers to specific interrogatories.

AT&T'S ANSWERS, OBJECTIONS AND MOTION FOR
PROTECTIVE ORDER WITH RESPECT TO
SPRINT UNITED/CENDEL'S FIRST SET OF INTERROGATORIES
DATED FEBRUARY 13, 1996
DOCKET NO. 950985-TP

INTERROGATORY NO. 1

Has AT&T been a party to local interconnection dockets or negotiations in states other than Florida?

RESPONSE:

Yes.

The above response is made in accordance with and subject to AT&T's Objections which were served on SPRINT UNITED/CENDEL on February 26, 1996.

Provided by: G. R. Follensbee, Director
AT&T
1200 Peachtree Street, NE
Atlanta, Georgia 30309

AT&T'S ANSWERS, OBJECTIONS AND MOTION FOR
PROTECTIVE ORDER WITH RESPECT TO
SPRINT UNITED/CENDEL'S FIRST SET OF INTERROGATORIES
DATED FEBRUARY 13, 1996
DOCKET NO. 950985-TP

INTERROGATORY NO. 2

If the answer to Interrogatory No. 1 is affirmative, please provide the name of each state in which such dockets or negotiations have occurred.

RESPONSE:

Georgia, North Carolina, South Carolina

**The above response is made in accordance with and subject to AT&T's
Objections which were served on SPRINT UNITED/CENDEL on February
26, 1996.**

Provided by: G. R. Follensbee, Director
AT&T
1200 Peachtree Street, NE
Atlanta, Georgia 30309

AT&T'S ANSWERS, OBJECTIONS AND MOTION FOR
PROTECTIVE ORDER WITH RESPECT TO
SPRINT UNITED/CENTEL'S FIRST SET OF INTERROGATORIES
DATED FEBRUARY 13, 1996
DOCKET NO. 950985-TP

INTERROGATORY NO. 3

For each state listed in response to Interrogatory No. 2, please provide the following information:

- (a) the docket number and other identifying information if the matter was a docketed proceeding;
- (b) whether an order was rendered and the date of the order;
- (c) if an order was rendered, whether it was for an interim/temporary or permanent arrangement for interconnection;
- (d) if an order was rendered, the date it is to be implemented, or if already implemented, the date of implementation;
- (e) identify all parties or persons participating in the docket;
- (f) if an order was issued, list the technical arrangements contained therein, including the location (s) at which local interconnection is allowed (e.g., tandem, end office, etc.);
- (g) if an order was issued, list each rate associated with the technical arrangements listed in response to Interrogatory 3(f);
- (h) if an order was issued, identify whether the rate mechanism for local interconnection was 1) usage based; 2) flat rate based; 3) bill and keep; or 4) other (specify);
- (i) if the rate mechanism for local interconnection is usage based or flat rate based, identify the specific rates(s).
- (j) if the agreement was interim/temporary, the term of the agreement.

AT&T'S ANSWERS, OBJECTIONS AND MOTION FOR
PROTECTIVE ORDER WITH RESPECT TO
SPRINT UNITED/CENDEL'S FIRST SET OF INTERROGATORIES
DATED FEBRUARY 13, 1996
DOCKET NO. 950985-TP

RESPONSE:

(a) Georgia - Docket No. 5958-U, Interconnection, Unbundling, and Resale of Telecommunications Services

North Carolina - Docket No. P-100, SUB 133, Local Exchange and Local Exchange Access Telecommunications Competition

South Carolina - Docket No. 93-036-C, Generic Proceeding to Review Intrastate Open Network Architecture (ONA) Services

(b) North Carolina Order in Docket No. P-100, SUB 133, February 23, 1996.

South Carolina Order No. 93-863, September 13, 1993.

(c) - (j) In accordance with and subject to AT&T's Objections which were served on SPRINT UNITED/CENDEL on February 26, 1996, AT&T objects to subparts (c) - (j) of this interrogatory on the grounds that such information is available to SPRINT UNITED/CENDEL from an examination of the documents covered by the related document production request. The documents speak for themselves and SPRINT UNITED/CENDEL is equally capable of extracting or summarizing the requested information.

Provided by: G. R. Follensbee, Director
AT&T
1200 Peachtree Street, NE
Atlanta, Georgia 30309

AT&T'S ANSWERS, OBJECTIONS AND MOTION FOR
PROTECTIVE ORDER WITH RESPECT TO
SPRINT UNITED/CENDEL'S FIRST SET OF INTERROGATORIES
DATED FEBRUARY 13, 1996
DOCKET NO. 950985-TP

INTERROGATORY NO. 4

If AT&T has reached an agreement for interconnection, whether in a docketed matter or otherwise, please describe in detail the provisions of the agreement, including, at a minimum, the type of information requested in Interrogatory 3(c) through (i).

RESPONSE:

AT&T has not reached an agreement for interconnection.

The above response is made in accordance with and subject to AT&T's Objections which were served on SPRINT UNITED/CENDEL on February 26, 1996.

Provided by: Mike Guedel, Manager
AT&T
1200 Peachtree Street, NE
Atlanta, Georgia 30309

AT&T'S ANSWERS, OBJECTIONS AND MOTION FOR
PROTECTIVE ORDER WITH RESPECT TO
SPRINT UNITED/CENDEL'S FIRST SET OF INTERROGATORIES
DATED FEBRUARY 13, 1996
DOCKET NO. 950985-TP

INTERROGATORY NO. 5

For each state listed in response to Interrogatory No. 2, please provide the following information:

- (a) whether an order or agreement concerning universal service has been rendered and if so, the date of such order or agreement;
- (b) if an order has been rendered, or an agreement reached, the date it is to be implemented, or if already implemented, the date of implementation;
- (c) if an order has been rendered or an agreement reached, whether it was for an interim/temporary or permanent arrangement for universal service;
- (d) the affect of such an order or agreement on the local interconnection dockets or agreement if one was reached;
- (e) a summary of the terms and conditions of the order or agreement.

RESPONSE:

- (a) No order has been rendered in the states identified in response to Interrogatory No. 2.
- (b) - (e) **In accordance with and subject to AT&T's Objections which were served on SPRINT UNITED/CENDEL on February 26, 1996, AT&T objects to subparts (b) -(e) of this interrogatory to the extent that such information is available to SPRINT UNITED/CENDEL from an examination of the documents covered by the related document production request. The documents speak for themselves and SPRINT UNITED/CENDEL is equally capable of extracting or summarizing the requested information.**

Provided by: G. R. Follensbee, Director
AT&T
1200 Peachtree Street, NE
Atlanta, Georgia 30309

AT&T'S ANSWERS, OBJECTIONS AND MOTION FOR
PROTECTIVE ORDER WITH RESPECT TO
SPRINT UNITED/CENTEL'S FIRST SET OF INTERROGATORIES
DATED FEBRUARY 13, 1996
DOCKET NO. 950985-TP

INTERROGATORY NO. 6

For each state listed in response to Interrogatory No. 2, please provide the following information:

- (a) whether an order or agreement concerning number portability has been rendered and if so, the date of such order or agreement;
- (b) identify all parties participating in any number portability docket or agreement;
- (c) a description of the mechanism ordered for number portability;
- (d) identify all rates (recurring and non-recurring residential and business) associated with the mechanism listed in 6(c);
- (e) the affect of such an order or agreement on local interconnection agreements or order.

RESPONSE:

(a) Georgia, March 1, 1996.

(b) - (e) **In accordance with and subject to AT&T's Objections which were served on SPRINT UNITED/CENTEL on February 26, 1996, AT&T objects to subparts (b) -(e) of this interrogatory to the extent that such information is available to SPRINT UNITED/CENTEL from an examination of the documents covered by the related document production request. The documents speak for themselves and SPRINT UNITED/CENTEL is equally capable of extracting or summarizing the requested information.**

Provided by: G. R. Follensbee, Director
AT&T
1200 Peachtree Street, NE
Atlanta, Georgia 30309

AT&T'S ANSWERS, OBJECTIONS AND MOTION FOR
PROTECTIVE ORDER WITH RESPECT TO
SPRINT UNITED/CENDEL'S FIRST SET OF INTERROGATORIES
DATED FEBRUARY 13, 1996
DOCKET NO. 950985-TP

INTERROGATORY NO. 7

For each state listed in response to Interrogatory No. 2, please provide the following information:

- (a) whether an order or agreement concerning collocation has been rendered and, if so, the date of such order or agreement;
- (b) a description of the terms and conditions of the order or agreement;
- (c) identify all rates associated with the order or agreement;
- (d) the affect of such an order or agreement on the local interconnection arrangements or order.

RESPONSE:

(a) No order has been rendered in the states identified in response to Interrogatory No. 2.

(b) - (d) **In accordance with and subject to AT&T's Objections which were served on SPRINT UNITED/CENDEL on February 26, 1996, AT&T objects to subparts (b) -(d) of this interrogatory to the extent that such information is available to SPRINT UNITED/CENDEL from an examination of the documents covered by the related document production request. The documents speak for themselves and SPRINT UNITED/CENDEL is equally capable of extracting or summarizing the requested information.**

Provided by: G. R. Follensbee, Director
AT&T
1200 Peachtree Street, NE
Atlanta, Georgia 30309

AT&T'S ANSWERS, OBJECTIONS AND MOTION FOR
PROTECTIVE ORDER WITH RESPECT TO
SPRINT UNITED/CENDEL'S FIRST SET OF INTERROGATORIES
DATED FEBRUARY 13, 1996
DOCKET NO. 950985-TP

INTERROGATORY NO. 8

For each state listed in response to Interrogatory No. 2, please provide the total number of local access lines in that state.

RESPONSE:

This information is in the possession of the incumbent local exchange companies. AT&T is thus unable to respond to the request. SPRINT UNITED/CENDEL is in a better position to determine this information than is AT&T.

Provided by: Mike Guedel, Manager
AT&T
1200 Peachtree Street, NE
Atlanta, Georgia 30309

AT&T'S ANSWERS, OBJECTIONS AND MOTION FOR
PROTECTIVE ORDER WITH RESPECT TO
SPRINT UNITED/CENTEL'S FIRST SET OF INTERROGATORIES
DATED FEBRUARY 13, 1996
DOCKET NO. 950985-TP

INTERROGATORY NO. 9

For each state identified in response to Interrogatory No. 2, state whether there has been a judicial appeal of any order rendered in the local interconnection docket. If your answer is in the affirmative, please identify the court in which such an appeal lies, the case number, the basis of the appeal and the current status of the appeal.

RESPONSE:

No.

The above response is made in accordance with and subject to AT&T's Objections which were served on SPRINT UNITED/CENTEL on February 26, 1996.

Provided by: G. R. Follensbee, Director
AT&T
1200 Peachtree Street, NE
Atlanta, Georgia 30309

AT&T'S ANSWERS, OBJECTIONS AND MOTION FOR
PROTECTIVE ORDER WITH RESPECT TO
SPRINT UNITED/CENDEL'S FIRST SET OF INTERROGATORIES
DATED FEBRUARY 13, 1996
DOCKET NO. 950985-TP

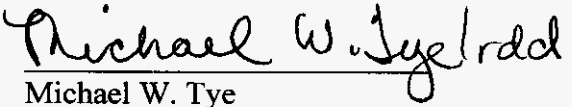
INTERROGATORY NO. 10

Please identify, in the space provided in Exhibit A, which if any, of the United Telephone Company of Florida and Central Telephone Company of Florida central offices listed on Exhibit A (and incorporated herein by reference) you plan to interconnect (local) with or plan to provide service as an ALEC in the next (a) year, (b) 2 years, and (c) 5 years. For each central office identified on Exhibit A as one that you plan to interconnect with or provide service as an ALEC, please explain the business reasons behind the analysis used to support the decision to interconnect or provide service within that central office area.

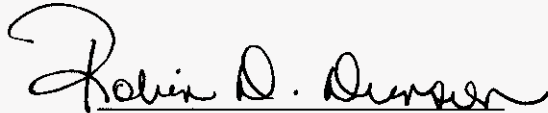
RESPONSE:

Consistent with AT&T's Objections served on SPRINT UNITED/CENDEL on February 26, 1996, AT&T objects to interrogatory on the grounds that it is irrelevant, unduly burdensome and oppressive. Moreover, AT&T objects to the disclosure the requested information on the grounds that it is highly sensitive, confidential business information and constitutes a "trade secret" that is privileged under Florida law.

SUBMITTED this 5th day of March, 1996.



Michael W. Tye
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
(904) 425-6360



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

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

AFFIDAVIT

**STATE OF GEORGIA
COUNTY OF FULTON**

BEFORE ME, the undersigned authority, personally appeared **GREG FOLLENSBEE**, who deposed and stated that he provided the answers to Interrogatories Nos. 1, 2, 3, 5, 6, 7, and 9 of Sprint United/Centel's First Set of Interrogatories to AT&T, served on AT&T in Docket No. 950985-TP, and that the responses are true and correct to the best of his information and belief.

DATED AT Atlanta, Georgia, this 4th day of March, 1996.



Signature of Affiant

SWORN TO AND SUBSCRIBED before me this 4th day of March, 1996.

NOTARY PUBLIC

State of Georgia

My Commission Expires: Sara K. Burrow, Notary Public
My Commission Expires September 9, 1999



Signature of Notary Public



Michael W. Tye
Sr. Attorney

Suite 700
101 N. Monroe Street
Tallahassee, FL 32301
904 425-6360
904 425-6361

February 26, 1996

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FEB 26 1996

FPSC-RECORDS/REPORTING

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

Re: Docket No. 950985-TP
MFS v. United-Centel

Dear Mrs. Bayo:

Enclosed for filing in the above referenced docket are an original and fifteen (15) copies of AT&T's Objections to Sprint-United/Centel's First Set of Interrogatories and First Request for Production of Documents.

Copies of the foregoing are being served on all parties of record in accordance with the attached Certificate of Service.

Yours truly,

Michael W. Tye

Attachments

cc: J. P. Spooner, Jr.
Parties of Record

COPIES FILED

BUREAU OF RECORDS

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of petition(s))
to establish nondiscriminatory)
rates, terms, and conditions for)
interconnection involving local) Docket No. 950985-TP
exchange companies and alternative)
local exchange companies pursuant)
to Section 364.162, Florida) Filed: February 26, 1996
Statutes)
_____)

AT&T'S OBJECTIONS TO SPRINT UNITED/CENDEL'S
FIRST SET OF INTERROGATORIES AND
FIRST 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 1.340 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following Objections to Central Telephone Company of Florida and United Telephone Company of Florida's (hereinafter collectively referred to as "SPRINT UNITED/CENDEL") First Set of Interrogatories and First Request for Production of Documents to AT&T.

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-95-1084-PCO-TP issued by the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced docket on August 30, 1995. Should additional

grounds for objection be discovered as AT&T prepares its answers and responses to the above-referenced set of interrogatories and requests for production of documents, respectively, AT&T reserves the right to supplement, revise, or modify its objections at the time that it serves its answers and responses on SPRINT UNITED/CENDEL. Moreover, should AT&T determine that a Protective Order is necessary with respect to any of the material requested by SPRINT UNITED/CENDEL, AT&T reserves the right to file a motion with the Commission seeking such an order at the time that it serves its answers and responses on SPRINT UNITED/CENDEL.

General Objections

AT&T makes the following General Objections to SPRINT UNITED/CENDEL's First Set of Interrogatories and First Request for Production of Documents which will be incorporated by reference into AT&T's specific responses when its answers and responses are served on SPRINT UNITED/CENDEL.

1. AT&T objects to the definitions of "you", "your", "company" or "AT&T" contained in the "Definitions" section of SPRINT UNITED/CENDEL's First Request for Production of Documents to the extent that such definitions 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, answers and responses to SPRINT UNITED/CENDEL'S First Set of Interrogatories and First Request for Production of Documents will be provided on behalf of AT&T Communications of the Southern States, Inc. which is the carrier certificated to provide regulated telecommunications services in Florida and which is a party to this docket. In addition to operating in the State of Florida, AT&T Communications of the Southern States, Inc. also operates in the States of Georgia, North Carolina and South Carolina. All references to "AT&T" in responding to SPRINT UNITED/CENDEL's discovery requests should be taken to mean AT&T Communications of the Southern States, Inc.

2. Unless otherwise indicated, AT&T has interpreted SPRINT UNITED/CENDEL's interrogatories and requests for production of documents to apply to AT&T's regulated intrastate operations in Florida and will limit its answers and responses accordingly. To the extent that any discovery 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 discovery 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 discovery 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 or responses provided by AT&T to SPRINT UNITED/CENDEL's discovery requests will be provided subject to, and without waiver of, the foregoing objection.

5. AT&T objects to each and every discovery 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 SPRINT UNITED/CENDEL'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 discovery 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 discovery 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 SPRINT UNITED/CENDEL's discovery requests seek proprietary confidential business information which is not subject to the "trade secrets" privilege, AT&T will make such information available to counsel for SPRINT UNITED/CENDEL pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

10. AT&T objects to each of the interrogatories to the extent that they seek information that is not maintained in the format requested.

11. AT&T objects to the discovery requests to the extent that they seek information in the nature of market research. AT&T should not be required to provide to a competitor information which AT&T has compiled or which AT&T has paid to have compiled and allow a competitor to have the benefit of such information.

12. AT&T has employees located in many different locations. in the course of its business, AT&T creates or comes into possession of countless documents that are not subject to any regulatory 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 will be provided in response to these discovery requests. Rather, AT&T's responses will provide all of the information obtained by AT&T after a reasonable and diligent search 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.

13. AT&T objects to every interrogatory that requests information about, or a summary of, a document which is also furnished pursuant to a document production request on the grounds that the documents speak for themselves and SPRINT UNITED/CENDEL is equally capable of extracting or summarizing the requested information.

Objections to Specific Interrogatories

Subject to, and without waiver of, each of the foregoing general objections, AT&T enters the following specific objections with respect to SPRINT UNITED/CENDEL's interrogatories:

INTERROGATORY NO. 3: Pursuant to General Objection No. 13, AT&T objects to subparts (c) to (j) of this interrogatory on the grounds that such information is available to SPRINT UNITED/CENDEL from an examination of the documents covered by the related document production request.

INTERROGATORY NO. 4: Pursuant to General Objection No. 13, AT&T objects to the interrogatory inasmuch as it requests the type of information requested in Interrogatory No. 3(c) to (i) on the grounds that such information is available to SPRINT

UNITED/CENDEL from an examination of the documents covered by the related document production request. To the extent that AT&T's answer to this interrogatory contains proprietary confidential business information, AT&T will allow counsel for SPRINT UNITED/CENDEL to inspect such information only upon execution of an appropriate Protective Agreement.

INTERROGATORY NO. 5: Pursuant to General Objection No. 13, AT&T objects to subparts (b) to (e) of this interrogatory on the grounds that such information is available to SPRINT UNITED/CENDEL from an examination of the documents covered by the related document production request.

INTERROGATORY NO. 6: Pursuant to General Objection No. 13, AT&T objects to subparts (b) to (e) of this interrogatory on the grounds that such information is available to SPRINT UNITED/CENDEL from an examination of the documents covered by the related document production request.

INTERROGATORY NO. 7: Pursuant to General Objection No. 13, AT&T objects to subparts (b) to (d) of this interrogatory on the grounds that such information is available to SPRINT UNITED/CENDEL from an examination of the documents covered by the related document production request.

INTERROGATORY NO. 9: Pursuant to General Objection No. 13, AT&T objects to this interrogatory on the grounds that such information is available to SPRINT UNITED/CENDEL from an examination of the documents covered by the related document production request.

INTERROGATORY NO. 10: To the extent that AT&T has not requested to interconnect with any of SPRINT UNITED/CENDEL'S central offices in Florida, AT&T objects to this interrogatory on the grounds that it is irrelevant, unduly burdensome and oppressive. Moreover, to the extent that SPRINT UNITED/CENDEL is a direct competitor of AT&T, AT&T objects to the disclosure of any information to SPRINT UNITED/CENDEL regarding the costs, profitability, or configuration of its actual or potential local exchange network, on the grounds that such information is highly sensitive, confidential business information which cannot be disclosed to a direct competitor and which constitutes a "trade secret" that is privileged under Florida law.

Objections to Specific Document Production Requests

Subject to, and without waiver of, the foregoing general objections, AT&T enters the following specific objections with respect to SPRINT UNITED/CENDEL's document production requests:

REQUEST NO. 1: Pursuant to General Objection No. 1, AT&T will limit its answer to this interrogatory to matters that apply to the regulated intrastate operations of AT&T Communications of the Southern States, Inc., which operates in the states of Florida, Georgia, South Carolina, and North Carolina. AT&T also objects to this request on the grounds set forth in the individual specific objections made by AT&T to the related interrogatories. Such specific objections are incorporated herein by specific reference thereto.

REQUEST NO. 2: Pursuant to General Objection No. 1, AT&T will limit its answer to this interrogatory to matters that apply to the regulated intrastate operations of AT&T Communications of the Southern States, Inc., which operates in the states of Florida, Georgia, South Carolina, and North Carolina. AT&T also objects to this request on the grounds that AT&T may be required to refer to or rely on a voluminous amount of information in order to respond

to the related interrogatories and this request is therefore overly broad, unduly burdensome, and oppressive.

REQUEST NO. 3: Pursuant to General Objection No. 1, AT&T will limit its answer to this interrogatory to matters that apply to the regulated intrastate operations of AT&T Communications of the Southern States, Inc., which operates in the states of Florida, Georgia, South Carolina, and North Carolina. AT&T also objects to this request as irrelevant inasmuch as AT&T is not a petitioner in this docket. AT&T's status is merely that of intervenor. Indeed, the issues before the Commission in this docket relate to the specific requests of the petitioners for interconnection. Moreover, AT&T objects to this request on the grounds that it is overly broad, unduly burdensome and oppressive in that it would have the effect of penalizing AT&T for its intervention in this case by forcing it to search files and provide documents which are not relevant to the petitions before the Commission. AT&T further objects to this request on the grounds that it calls for highly sensitive, confidential business information which is protected by the "trade secrets" privilege under Florida law. AT&T objects to any request that would require it to release such information, even under a Protective Agreement, to a competitor, such as SPRINT


UNITED/CENDEL. AT&T submits that this request is an improper attempt by SPRINT UNITED/CENDEL to secure valuable, competitively sensitive information intended to give it an advantage in any future negotiations that may take place between AT&T and SPRINT UNITED/CENDEL. The forced disclosure of such information in this docket would improperly influence the bargaining positions of the parties, contrary to the intent of Section 364.161(1) of the Florida Statutes and Section 251(c)(1) of the Telecommunications Act of 1996.

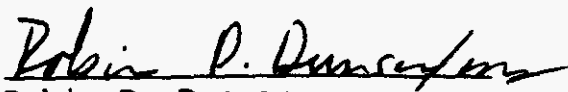
REQUEST NO. 4: In addition to, and without waiver of, the General Objections stated above, AT&T objects to this request on the grounds set forth in the individual specific objections made by AT&T to the related interrogatory. Such specific objections are incorporated herein by specific reference thereto.

REQUEST NO. 5: In addition to, and without waiver of, the General Objections stated above, AT&T objects to this request on the grounds set forth in the individual specific objections made by AT&T to the related interrogatory. Such specific objections are incorporated herein by specific reference thereto.

AT&T's Objections to Sprint United/Centel's
First Set of Interrogatories and
First Request for Production of Documents
Docket No. 950985-TP

SUBMITTED this 26th day of February, 1996.


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CERTIFICATE OF SERVICE

DOCKET NO. 950985-TP

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by next day express mail, U. S. Mail or hand-delivery to the following parties of record this 26th day of February, 1996.

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