



ORIGINAL  
FILE COPY

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September 27, 1996

VIA HAND DELIVERY

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

Re: Docket Nos. 960847-TP & 960980-TP

Dear Mrs. Bayo:

Enclosed for filing in the above-referenced docket are an original and fifteen (15) copies of AT&T's, Objections to GTE Florida Incorporated's First Request for Production of Documents.

Also enclosed for filing are an original and fifteen (15) copies of AT&T's Objections to GTE Florida Incorporated's First Set of Interrogatories.

An extra copy of each is included. Please date stamp the extra copies and return to me.

Yours truly,

Robin D. Dunson

Enclosures

cc: Mike Tye  
Tracy Hatch  
Parties of Record

- ACK
- AFA
- APP
- CAF
- CMU
- CTR
- EAG
- LEG
- LIN
- OPC
- RCH
- SEC
- WAS
- OTH

RECEIVED & FILED  
  
EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE  
10429 SEP 27 88  
FPSC-RECORDS/REPORTING

ORIGINAL  
FILED

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

**In re: Petition by AT&T Communications of )  
the Southern States, Inc., MCI )  
Telecommunications Corporation and MCI )  
Metro Access Transmission Services, 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  
Docket No. 960980-TP**

**Filed: September 27, 1996**

**AT&T'S OBJECTIONS TO GTE FLORIDA INCORPORATED'S  
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 1.350 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following Objections to GTE Florida Incorporated's (hereinafter "GTE") First 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 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 GTE. Moreover, should AT&T determine that a Protective Order is necessary**

DOCUMENT NUMBER-DATE  
**10429 SEP 27 1996**  
FPSC-RECORDS/REPORTING

**with respect to any of the material requested by GTE, 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 GTE.**

#### General Objections

AT&T makes the following General Objections to GTE'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 GTE.

1. AT&T objects to paragraph 1 of the "Definitions" section of GTE's First Set of Requests for Production of Documents to the extent that the definitions of "you", "your", and "Company" 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. AT&T Communications of the Southern States, Inc. operates in the States of Florida, Georgia, North Carolina and South Carolina. All references to "AT&T" in responding to GTE's requests for production of documents should be taken to mean AT&T Communications of the Southern States, Inc.

2. AT&T has interpreted GTE'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 GTE'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 GTE'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 GTE'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 GTE 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 GTE'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 GTE's requests:

**REQUEST NOS 1 & 2:** AT&T objects to this request on the grounds that it is irrelevant, overly broad, unduly burdensome and not calculated to lead to the discovery of admissible evidence. Further, press releases are public documents and can be obtained by GTE from public sources.

**REQUEST NOS. 3, 4 & 5:** AT&T objects to this request on the grounds that it is irrelevant, overly broad, unduly burdensome and not calculated to lead to the discovery of admissible evidence. AT&T further objects to this request on the grounds that it seeks highly confidential trade secret information that is of no relevance to this proceeding. AT&T's promotional or marketing materials that has been or is being developed by AT&T has no relevance to GTE's obligations under the federal act.

**REQUEST NOS. 7, 8, 9, 10, 11, 13, 14, 15, 16, 17, 19, 20, 25, 26, 27, 28, 32, 34, 35, 39, 40, 41:** AT&T objects to this request on the grounds that its negotiations with other carriers are irrelevant to this proceeding. This request is not, therefore, reasonably calculated to lead to the discovery of admissible evidence. AT&T also objects to this request to the extent it seeks to discover information which is proprietary and confidential to other ILECs and which may be the subject of a protective between the parties involved

in negotiations. AT&T also objects to this request on the grounds that it is overly broad, unduly burdensome and oppressive.

**REQUEST NO. 22 & 23 :** AT&T objects to this request on the grounds that it is overly broad, unduly burdensome, irrelevant, and not calculated to lead to the discovery of admissible evidence.

**REQUEST NO. 48, 49:** AT&T objects to this request on the grounds that to the extent GTE is seeking information about other than the local exchange market it is irrelevant and not calculated to lead to the discovery of admissible evidence. AT&T also objects on the ground of confidentiality because the request seeks highly proprietary competitive information not relevant to this proceeding.

SUBMITTED this 27th day of September, 1996.

*Robin D. Dunson / dmf*

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201 South Monroe Street  
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(904) 222-8611

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



**CERTIFICATE OF SERVICE**

**DOCKET NOS. 960847-TP & 960980-TP**

I HEREBY CERTIFY that a true copy of AT&T's Objections to GTE Florida Incorporated's First Set of Interrogatories and First Request for Production of documents have been furnished by Overnight or Hand Delivery to the following parties of record this 27th day of September, 1996:

GTE Florida Incorporated  
Anthony P. Gillman, Esq.  
c/o Diane McLelland  
106 East College Avenue  
Suite 1440  
Tallahassee, Florida 32301-7704

Kim Caswell  
GTE Florida Incorporated  
P.O. Box 110  
Mail Code FLTC 0007  
Tampa, Florida 33601

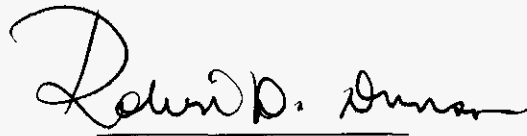
GTE Mobile Communications  
c/o Rutledge Law Firm  
Kenneth Hoffman, Esq.  
215 S. Monroe Street  
Suite 420  
Tallahassee, Florida 32301

Donna Canzano, Esq.  
Division of Legal Services  
Florida Public Service Comm.  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399

Richard D. Melson, Esq.  
Hopping Green Sams & Smith  
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Tallahassee, FL 32301

Martha P. McMillin  
MCI Telecommunications  
780 Johnson Ferry Road  
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Atlanta, Georgia 30342

Mark A. Logan, Esq.  
Brian D. Ballard, Esq.  
Bryant, Miller & Olive, P.A.  
201 S. Monroe Street  
Tallahassee, Florida 32301

  
Robin D. Dunson

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

**In re: Petition by AT&T Communications of )  
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Telecommunications Corporation and MCI ) Docket No. 960847-TP  
Metro Access Transmission Services, Inc., for ) Docket No. 960980-TP  
arbitration of certain terms and conditions )  
of a proposed agreement with GTE Florida, )  
Incorporated concerning interconnection and ) Filed: September 27, 1996  
resale under the Telecommunications Act of 1996) )  
\_\_\_\_\_)**

**AT&T'S OBJECTIONS TO GTE FLORIDA INCORPORATED'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 1.350 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following Objections to GTE Florida Incorporated's (hereinafter "GTE") First Set of Interrogatories 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 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 GTE. Moreover, should AT&T determine that a Protective Order is necessary with**

**respect to any of the material requested by GTE, 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 GTE.**

### General Objections

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

1. AT&T objects to paragraph 1 of the "Definitions" section of GTE's First Set of Interrogatories to the extent that the definitions of "you", "your", and "Company" 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 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. AT&T Communications of the Southern States, Inc. operates in the States of Florida, Georgia, North Carolina and South Carolina. All references to "AT&T" in responding to GTE's interrogatories should be taken to mean AT&T Communications of the Southern States, Inc.

2. AT&T has interpreted GTE'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 interrogatory 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 by AT&T in response to GTE'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.

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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 GTE's interrogatories:

**INTERROGATORY NO 1:** AT&T objects to this interrogatory on the grounds that it is irrelevant, overly broad, unduly burdensome and not calculated to lead to the discovery of admissible evidence. AT&T further objects to this interrogatory on the grounds that it seeks highly confidential trade secret information that is of no relevance to this proceeding.

**INTERROGATORY NOS. 4, 7, 10, 12, 17, 32, 34, 38, 40, 43:** AT&T objects to this interrogatory on the grounds that its negotiations and discussions with other carriers are irrelevant to this proceeding and is not, therefore, reasonably calculated to lead to the discovery of admissible evidence. AT&T also objects to this interrogatory to the extent it seeks to discover information which may be proprietary and confidential to other ILECs and which may be the subject of a protective agreement between the parties involved in negotiations. AT&T also objects to this interrogatory on the grounds that it is overly broad, unduly burdensome and oppressive.

**INTERROGATORY NO. 8, 14, 45, 46, 47:** AT&T objects to this interrogatory on the grounds that it is irrelevant, overly broad, unduly burdensome and not calculated to lead to the discovery of admissible evidence. AT&T further objects to this interrogatory on the grounds that it seeks highly confidential trade secret information that is of no relevance to this proceeding. To the extent GTE seeks information pertaining to AT&T's obligations and practices as an interexchange carrier in the highly competitive interexchange market, such information is irrelevant to GTE's duties and obligations under the federal act, the FCC's Order, and Florida law as a monopolist, incumbent local exchange carrier in the local exchange market.

**INTERROGATORY NO. 20, 21, 22, 23:** AT&T objects to this interrogatory on the grounds that it seeks highly confidential trade secret information that is of no relevance to this proceeding.

**INTERROGATORY NO. 24, 25, 26, 27:** AT&T objects to this interrogatory on the grounds that it is irrelevant, and not calculated to lead to the discovery of admissible evidence. To the extent GTE's seeks information pertaining to AT&T's obligations and practices as an interexchange carrier in the highly competitive interexchange market, such information is irrelevant to GTE's duties and obligations under the federal act, the FCC's Order, and Florida law as a monopolist, incumbent local exchange carrier in the local exchange market.

SUBMITTED this 27th day of September, 1996.

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106 East College Avenue  
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Tampa, Florida 33601

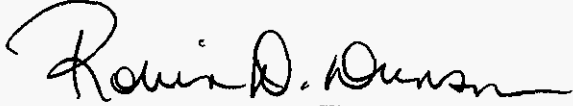
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