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RECORDS AND
REPORTING

July 17, 1998

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

RE: Docket No. 980696-TP

Dear Mrs. Bayo:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Objection to the First Set of Interrogatories of AT&T of the Southern States, Inc. Please file these documents in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served on the parties shown on the attached Certificate of Service.

Sincerely,

J. Phillip Carver (KK)
J. Phillip Carver

Enclosures

ACK 3 cc: All Parties of Record
AFA _____ A. M. Lombardo
APP _____ R. G. Beatty
CAF _____ W. J. Ellenberg

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RECORDS AND REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the Cost)
of Basic Local Telecommunications) Docket No.: 980696-TP
Service, pursuant to Section 364.025,)
Florida Statutes)
_____) Dated: July 17, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
OBJECTION TO THE FIRST SET OF INTERROGATORIES
OF AT&T OF THE SOUTHERN STATES, INC.**

BellSouth Telecommunications, Inc., ("BellSouth" or "Company"), hereby files, pursuant to Rule 25-22.034 and 25-22.035, Florida Administrative Code, and Rules 1.340 and 1.280(b), Florida Rules of Civil Procedure, the following Objection to the First Set of Interrogatories to BellSouth of AT&T of the Southern States, Inc..

The objection stated herein is preliminary in nature and is made at this time for the purpose of complying with the five-day requirement set forth in the procedural order issued by the Florida Public Service Commission ("Commission") in the above-captioned docket. Should additional grounds for objection be discovered as BellSouth prepares its Answers to the above-referenced interrogatories, BellSouth reserves the right to supplement, revise, or modify its objections at the time that it serves its Answers. Moreover, should BellSouth determine that a Protective Order is necessary with respect to any of the requested material, BellSouth reserves the right to file a motion with the Commission seeking such an order at the time that it serves its Answers.

OBJECTION

BellSouth objects to Interrogatory No. 10, which requests the production of planning forecasts for the future provision of

cable television services in Florida by BellSouth. BellSouth objects to this Interrogatory because it is irrelevant. Moreover, it would appear to be a blatant attempt to obtain competitively sensitive information that, again, has no relevance whatsoever to the matters at issue in this docket. The purpose of this docket is to respond to the legislative mandate to provide certain information regarding universal telephone service and the cost of providing this service. Without any explanation or justification, AT&T has utilized this docket to request BellSouth's future plans regarding a wholly unrelated technology and a different line of business, i.e., cable television. Although presumably AT&T has its own competitive reasons for wishing to have this information from BellSouth, the fact remains that it has no relevance to the issues that pertain in this docket. Moreover, the requested information, if any exists, would be competitive information that, if released to BellSouth's competitors, has the obvious potential to result in harm to BellSouth. Accordingly, AT&T should not be allowed to misuse the discovery process in this docket to obtain irrelevant, but sensitive information that is both demonstrably irrelevant and in no way calculated to lead to the discovery of admissible evidence.

ORIGINAL

**CERTIFICATE OF SERVICE
DOCKET NO. 980696-TP (HB4785)**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via U.S. Mail and (*) Hand Delivery this 17th day of July, 1998 to the following:

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