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RECORDS AND
REPORTING

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August 10, 1998

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

Dear Mrs. Bayo:

Re: Docket No. 980696-TP

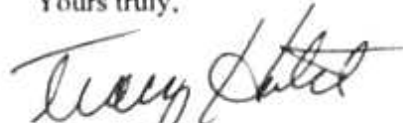
You will find enclosed for filing in the above-referenced docket an original and fifteen (15) copies of AT&T's Objections to Sprint-Florida's First Set of Interrogatories and First Request for Production of Documents to AT&T.

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

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FPSC-BUREAU OF RECORDS

Yours truly,


Tracy Hatch

TH/mr
Enclosures
cc: Parties of Record

- ACK
- AFA 2
- APP _____
- CAF 2
- CMU King
- CTR _____
- EAG _____
- LEG 2
- LIN 5
- OPC _____
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DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the cost of basic local telecommunications service, pursuant to Section 364.025, Florida Statutes.) DOCKET NO. 980696-TP
)
) DATED: August 10, 1998
)
)

**AT&T'S OBJECTIONS TO SPRINT-FLORIDA, INC.'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 Objections to Sprint-Florida, Inc.'s (hereinafter "Sprint") 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 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 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 SPRINT. Moreover, should AT&T determine that a Protective Order is necessary with respect to any

of the material requested by SPRINT, 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 SPRINT.

General Objections

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

1. AT&T objects to the following provisions of the "Definitions" section of SPRINT's First Set of Interrogatories:

Paragraph 1: AT&T objects to the definitions of "AT&T" 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 will be provided on behalf of AT&T Communications of the Southern States, Inc. which is the interexchange carrier (hereinafter "IXC") certificated to provide regulated telecommunications services in Florida and which is a party to this docket. All references to "AT&T" in responding to SPRINT's interrogatories should be taken to mean AT&T Communications of the Southern States, Inc.

2. Unless otherwise indicated, AT&T has interpreted SPRINT'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 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 interrogatories. Any Answers provided by AT&T in response to SPRINT'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.

6. AT&T objects to SPRINT'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 interrogatory, 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 interrogatory 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's interrogatories request proprietary confidential business information which is not subject to the "trade secrets" privilege, AT&T will make such information available to counsel for SPRINT pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

Objections to Specific Interrogatories


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

INTERROGATORY NO. 1: Pursuant to the General Objections stated above, 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. In addition to the General Objections stated above, AT&T specifically

objects to AT&T objects to Request for Production of Documents No. 1 on the grounds that the information that BellSouth is requesting is the intellectual property of third party vendors and is only available from PNR. The information requested is not and never as been in the possession of AT&T. This information is commercially available to Sprint from PNR. Sprint and others were invited previously to visit PNR's premises in Jenkintown, Pennsylvania to obtain the data requested. AT&T and MCI assumed the expense at that time when other parties obtained this data for other states. Representatives of Sprint were in attendance and participated in the PNR site visit. Now Sprint apparently seeks to require AT&T to provide again for a special viewing of the information. This is unduly burdensome on AT&T. AT&T will arrange a visit to PNR to enable Sprint to view this information as long as Sprint makes arrangements to visit PNR and assume the expense of obtaining the requested data.

INTERROGATORY NO. 2: Same objection as Interrogatory No. 1.

SUBMITTED this 10th day of August, 1998.


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(904) 425-6364

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 980696-TP

DATED: August 4, 1998

AT&T'S OBJECTIONS TO SPRINT-FLORIDA, INC.'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 Sprint-Florida, Inc.'s (hereinafter "Sprint") 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 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. Moreover, should AT&T determine that a

Protective Order is necessary with respect to any of the material requested, AT&T reserves the right to file a motion with the Commission seeking such an order at the time that it serves its Responses.

General Objections

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

1. AT&T objects to the following provisions of the "Definitions" section of SPRINT's First Request for Production of Documents:

Paragraph 1: AT&T objects to the definition of "AT&T" 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 will be provided on behalf of AT&T Communications of the Southern States, Inc. which is the interexchange carrier (hereinafter "IXC") certificated to provide regulated telecommunications services in Florida

and which is a party to this docket. All references to "AT&T" in responding to SPRINT's request for production should be taken to mean AT&T Communications of the Southern States, Inc.

2. AT&T objects to Sprint's First 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.

3. AT&T has interpreted Sprint'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.

4. 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.

5. 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 Sprint's requests will be provided subject to, and without waiver of, the foregoing objection.

6. 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.

7. AT&T objects to Sprint'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.

8. AT&T objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

9. 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.

10. 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 Sprint'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 Sprint pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

11. 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 Sprint'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.

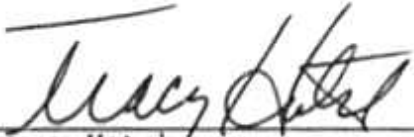
Objections to Specific Requests

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

Request No. 1: AT&T objects to Request for Production of Documents No. 1 on the grounds that the information that BellSouth is requesting is the intellectual property of third party vendors and is only available from PNR. It is not and never has been in the possession of AT&T. This information is commercially available to Sprint. Sprint and others were invited previously to visit PNR's premises in Jenkintown, Pennsylvania to obtain the data requested. AT&T and MCI assumed the expense at that time when other parties obtained this data for other states. Representatives of Sprint were in attendance and participated in the PNR site visit. Now Sprint apparently seeks to require AT&T to provide again for a special viewing of the information. This is unduly burdensome on

AT&T. AT&T will arrange a visit to PNR to enable Sprint to view this information as long as Srint makes arrangements to visit PNR and assume the expense of obtaining the requested data.

SUBMITTED this 10th day of August, 1998.


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

ORIGINAL

**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 10th day of August, 1998:

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DOCUMENT NUMBER-DATE
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