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RECORDS AND
REPORTING

August 10, 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 Objections to the Second Set of Interrogatories and Third Request for Production of Documents 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.

RECEIVED & FILED

Sincerely,

J. Phillip Carver
FPSC-BUREAU OF RECORDS J. Phillip Carver (cc)
J. Phillip Carver

ACK	<input checked="" type="checkbox"/>	Enclosures
AFA	<u>2</u>	cc: All Parties of Record
APP	_____	A. M. Lombardo
CAF	_____	R. G. Beatty
CMU	<u> </u>	W. J. Ellenberg
CTR	_____	
EAG	_____	
LEG	<u>2</u>	
LIN	<u>5</u>	
OPC	_____	
RCH	_____	
SEC	<u>1</u>	
WAS	_____	
OTH	_____	

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/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: August 10, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
OBJECTIONS TO THE SECOND SET OF INTERROGATORIES AND
THIRD REQUEST FOR PRODUCTION OF DOCUMENTS
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, hereby submits the following Objections to the Second Set of Interrogatories and Third Request for Production of Documents of AT&T of the Southern States, Inc. ("AT&T").

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 the procedural order issued by the Florida Public Service Commission ("Commission") in the above-referenced dockets. Should additional grounds for objection be discovered as BellSouth prepares its Answers to the above-referenced set of requests, BellSouth reserves the right to supplement, revise, or modify its objections at the time that it serves its Answers on AT&T. Moreover, should BellSouth determine that a Protective Order is necessary with respect to any of the material requested by AT&T, BellSouth reserves the right to file

a motion with the Commission seeking such an order at the time that it serves its Answers on AT&T.

GENERAL OBJECTIONS

BellSouth makes the following General Objections to AT&T's Second Set of Interrogatories and Third Request for Production of Documents which will be incorporated by reference into BellSouth's specific responses when its Answers are served on AT&T.

1. BellSouth objects to the requests to the extent that such requests seek to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such requests are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. BellSouth has interpreted AT&T's requests to apply to BellSouth's regulated intrastate operations in Florida and will limit its Answers 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, BellSouth objects to such request to produce as irrelevant, overly broad, unduly burdensome, and oppressive.

3. BellSouth 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. BellSouth 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 Answers provided by BellSouth in response to AT&T's request will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth 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. BellSouth will attempt to note each instance where this objection applies.

6. BellSouth objects to AT&T's discovery requests, instructions and definitions, insofar as they seek to impose obligations on BellSouth that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

7. BellSouth objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

8. BellSouth objects to each and every request, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

the grounds that compliance would impose an undue burden or expense.

Respectfully submitted this 10th day of August, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

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

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express and *Hand Delivery this 10th day of August, 1998 to the following:

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(+) Protective Agreements