

MARY K. KEYER
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RECORDS AND REPORTING

ORIGINAL

October 9, 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. 980733-TL

Dear Mrs. Bayo:

Enclosed are an original and 15 copies of BellSouth Telecommunications, Inc.'s Objections to Staff's First Set of Interrogatories. 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,

Mary K. Keyer (kr)

Mary K. Keyer

- ACK _____
- AFA 1 _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG 2 _____
- LIN [initials] _____
- OPC _____
- RCH _____
- SEC 1 _____
- WAS _____
- OTH _____

Enclosures

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
W. J. Ellenberg (w/o enclosures)

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DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 980733-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Hand-Delivery this 9th day of October, 1998, to the following:

Beth Keating
Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Mary K. Keyer (kce)
Mary K. Keyer

GENERAL OBJECTIONS

BellSouth makes the following General Objections to Staff's First Set of Interrogatories which will be incorporated by reference into BellSouth's specific answers when they are served on Staff.

1. BellSouth objects to the interrogatories to the extent they 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 objects to Staff's interrogatories to the extent they are intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission. BellSouth objects to such interrogatories as being irrelevant, overly broad, unduly burdensome, and oppressive.

3. To the extent the interrogatories ask for revenue information, BellSouth objects as this information is not relevant to the study and report on the fair and reasonable rate for residential basic local telecommunications service as required of the Public Service Commission ("Commission") in compliance with Chapter 98-277, General Laws of Florida.

4. To the extent the interrogatories ask for information regarding business or deregulated services, BellSouth objects because such information is irrelevant to the cost of providing residential basic local telecommunications service.

5. BellSouth 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.

6. BellSouth 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 requests or interrogatories. Any answers provided by BellSouth in response to Staff's interrogatories will be provided subject to, and without waiver of, the foregoing objection.

7. BellSouth objects to each and every interrogatory insofar as the interrogatory 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.

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

9. BellSouth 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 Staff requests proprietary confidential business information which is not subject to the "trade secrets" privilege, BellSouth will make such information available to counsel for

Staff pursuant to a Notice of Intent to Request Confidential Treatment and subject to any other general or specific objections contained herein.

SPECIFIC OBJECTIONS TO INTERROGATORIES

BellSouth provides the following objections to Staff's First Set of Interrogatories.

1. BellSouth objects to the information requested in Interrogatory 1a and 1b as being irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. The information requested for interstate toll and interLATA toll is not related to the cost of providing residential basic local telecommunications service. See General Objections 2 and 7.

2. BellSouth objects to Interrogatories 2 and 3 to the extent they request information regarding revenues, more specifically "interstate access" and "intrastate interLATA access" revenues, which have no relevance to the cost of providing residential basic local telecommunications service. Revenues are not equivalent to charges and are irrelevant in this case. See General Objections 2, 3 and 7.

BellSouth has provided the relevant information requested in response to the numerous data requests served on BellSouth by the Division of Auditing and Division of Communications. As represented by the Division of Communications in the Oral Argument on the Attorney General's motion to compel discovery from BellSouth in this docket, it has the information necessary for its recommendations to the Commission in completing its study and formulating a

report to the legislature regarding fair and reasonable rates for Florida's customers in compliance with Chapter 98-277, General Laws of Florida.

For these reasons, BellSouth objects to the foregoing interrogatories.

Respectfully submitted this 9th day of October, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

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ROBERT G. BEATTY

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