

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re:) Docket No. 991854-TP
 Petition for Arbitration of the Interconnection)
 Agreement Between BellSouth Telecommunications,) Filed: March 23, 2000
 Inc. and Intermedia Communications, Inc.)
 Pursuant to Section 252(b) of the)
 Telecommunications Act of 1996)

**INTERMEDIA COMMUNICATIONS INC.'S OBJECTIONS TO
 BELLSOUTH TELECOMMUNICATIONS, INC.'S FIRST REQUEST
 FOR PRODUCTION OF DOCUMENTS**

INTERMEDIA COMMUNICATIONS INC. ("Intermedia"), pursuant to the Florida Rules of Civil Procedure, hereby submits its objections to BellSouth Telecommunications, Inc.'s ("BellSouth") First Request for Production of Documents.

GENERAL OBJECTIONS

Intermedia asserts the following objections with respect to each and every request for production served by BellSouth:

1. Intermedia objects to each document request to the extent that any response would require the inclusion of information protected by the attorney-client privilege, the work product doctrine, the joint defense privilege or any other discovery privilege recognizable under the Florida Rules of Civil Procedure or other applicable Florida law.
2. Intermedia objects to each document request to the extent such request seeks disclosure of trade secrets, confidential, or competitively confidential information of Intermedia.

Intermedia will only produce information upon the execution of an appropriate Confidentiality Agreement and/or Protective Order providing, among other things, that such information shall be used solely for purposes of these proceedings, and that access and distribution of such

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information within BellSouth will be strictly limited to those needing access for the purposes of these proceedings.

3. Intermedia objects to the Definitions and Instructions to the extent that they exceed the obligations imposed on Intermedia by the applicable rules of procedure in the State of Florida and by this Commission. For example, Intermedia objects to BellSouth's instruction (e) demanding that Intermedia supplement its discovery responses; such supplementation is not required by the Florida Rules of Civil Procedure.

4. Intermedia objects to each and every production request to the extent it seeks to impose an obligation on Intermedia 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 the applicable discovery rules.

5. Intermedia objects to each and every production request to the extent it is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission. Intermedia objects to such requests as being irrelevant, overly broad, unduly burdensome, and oppressive.

6. Intermedia objects to each and every production request to the extent it is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations not properly defined or explained for these purposes. Any answers provided by Intermedia to these requests will be provided subject to, and without waiver of, the objection.

7. Intermedia objects to each and every production request to the extent it is not reasonably calculated to lead to admissible evidence and is not relevant to the subject matter of this proceeding. Intermedia will note in its responses where this objection applies.

8. Intermedia objects to providing documents in response to these production requests to the extent they are already in the public record before the Commission.

SPECIFIC OBJECTIONS

In addition, Intermedia asserts the following specific objections to BellSouth's First Request for Production. Notwithstanding that, Intermedia intends to produce documents responsive to these requests consistent with and subject to each and every objection stated herein.

6. Produce copies of all agreements between Intermedia and an Incumbent Local Exchange Carrier (other than BellSouth) under Section 252 of the Act, whether the agreement was reached through voluntary negotiation or compulsory arbitration.

RESPONSE: OBJECTION. Intermedia objects to this request on the grounds that it seeks information which is not relevant or will not lead to the discovery of admissible evidence. Intermedia further objects to this request on the grounds that it is overly burdensome. Finally, Intermedia objects to this request on the grounds that it is overly broad.

8. Please provide any and all written agreements and/or contracts entered between Intermedia and its ISP customers identified in response to Interrogatory No. 8, as well as any documents referring to any oral agreements entered with such ISP customers.

RESPONSE: OBJECTION. Intermedia objects to this request on the grounds that it seeks information which is irrelevant or will not lead to the discovery of admissible evidence. Intermedia further objects to this request on the grounds that it is overly burdensome. Finally, Intermedia objects to this request on the grounds that it is overly broad.

9. Produce any and all cost studies, evaluations, reports or analyses prepared by or for Intermedia concerning any issue raised by Intermedia in the Arbitration Petition.

RESPONSE: OBJECTION. Intermedia objects to this request on the grounds that it is overly broad. Subject to and without waiving the foregoing objection, responsive documents will be produced to the extent available.

10. Produce all documents that refer, reflect or describe the network architecture used by Intermedia to deliver traffic to ISPs.

RESPONSE: OBJECTION. Intermedia objects to this request on the grounds that it is overly broad. Intermedia further objects to this request on the grounds that it seeks information which is not relevant and will not lead to the discovery of admissible evidence.

11. Produce all documents that refer, relate or describe Intermedia's delivery of traffic to ISPs located outside the rate center in which the call to the ISP originated.

RESPONSE: OBJECTION. Intermedia objects to this request on the grounds that it is overly broad. Intermedia further objects to this request on the grounds that it seeks information which is not relevant and will not lead to the discovery of admissible evidence.

12. Produce all documents that refer, relate or describe Intermedia's collection of reciprocal compensation for its delivery of traffic to ISPs located outside the rate center in which the call to the ISP originated.

RESPONSE: OBJECTION. Intermedia objects to this request on the grounds that it seeks information which is not relevant and will not lead to the discovery of admissible evidence.

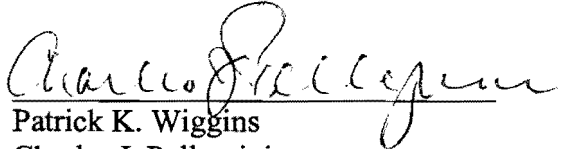
Intermedia further objects to this request on the grounds that it is overly broad. Finally, Intermedia objects to this request on the grounds that it seeks disclosure of confidential and proprietary information.

13. Produce documents sufficient to reflect the location of Intermedia's end-users in relation to Intermedia's switch(es).

RESPONSE: OBJECTION. Intermedia objects to this request on the grounds that it seeks information which is not relevant and will not lead to the discovery of admissible evidence. Intermedia further objects to this request on the grounds that it is overly broad. Finally, Intermedia objects to this request on the grounds that it seeks disclosure of confidential and proprietary information.

Respectfully submitted,

INTERMEDIA COMMUNICATIONS INC.

By: 

Patrick K. Wiggins
Charles J. Pellegrini
WIGGINS & VILLACORTA, P.A.
2145 Delta Blvd., Suite 200
Tallahassee, FL 32303
(850) 385-6007
(850) 385-6008 (facsimile)

Of Counsel

Scott A. Sapperstein
Senior Policy Counsel
Intermedia Communications Inc.
3625 Queen Palm Drive
Tampa, Florida 33619
(813) 829-4093
(813) 829-4923 (facsimile)

Jonathan E. Canis
Ronald J. Jarvis
Enrico C. Soriano
KELLEY DRYE & WARREN LLP
1200 19th Street, N.W., Fifth Floor
Washington, D.C. 20036
(202) 955-9600
(202) 955-9792 (facsimile)

ITS ATTORNEYS

Dated: March 23, 2000

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by Hand Delivery(*) or Federal Express(**) this 23rd day of March, 2000 to the following:

Tim Vaccaro*
Staff Counsel
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Nancy Sims*
BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301

Nancy B. White**
Michael P. Goggin**
c/o Nancy Sims
BellSouth Telecommunications, Inc.
Museum Tower
150 West Flagler Street
Suite 1910
Miami, Florida 33130

R. Douglas Lackey**
A. Langley Kitchings
General Attorneys
BellSouth Telecommunications, Inc.
Suite 4300, BellSouth Center
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375


Charles J. Pellegrini