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FILE COPY

May 2, 1994

Mrs. Blanca S. Bayo  
Director, Division of Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32301

Re: Docket No. [REDACTED]

Dear Mrs. Bayo:

Enclosed please find an original and fifteen copies of BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company's Responses and Objections to IAC's Third Set of Data Requests to Southern Bell to be filed in the above mentioned docket for the Commission's consideration.

A copy of this letter is enclosed. Please indicate on the copy 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.

- ACK ✓
- AFA 2
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMLI (CMLI)
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 1 Enclosures
- LIN 6 cc: H. R. Anthony
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

Sincerely,

RECEIVED & FILED

*mes*

*Mary Jo Peed (Am)*  
Mary Jo Peed

FPSC-BUREAU OF RECORDS

All Parties noted on Certificate of Service

DOCUMENT NUMBER-DATE

04:27 MAY-28

FPSC-RECORDS/REPORTING

BEFORE  
THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Expanded Interconnection ) DOCKET NO. 921074-TP  
Phase II and Local Transport )  
Restructure )  
\_\_\_\_\_ ) MAY 2, 1994

BELLSOUTH TELECOMMUNICATIONS, INC.'S D/B/A  
SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
RESPONSES AND OBJECTIONS TO IAC'S THIRD  
SET OF DATA REQUESTS TO SOUTHERN BELL

COMES NOW, BellSouth Telecommunications, Inc., doing business as Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company") and files pursuant to Rules 25-22.04, Florida Administrative Code and Rule 1.350, Florida Rules of Civil Procedure, its Objections and Responses to Interexchange Access Coalition's ("IAC") Third Set of Data Requests.

GENERAL RESPONSE AND OBJECTIONS

1. Southern Bell objects to IAC's definition of "document" or "documents". IAC's definition is overly broad and objectionable pursuant to the standards adopted in Caribbean Security Systems v. Security Control Systems, Inc., 486 S.2d. 654 (Fla. App. 3rd. Dist. 1986)

2. Southern Bell does not believe it was IAC's intent to require Southern Bell to produce again the same documents previously produced in other dockets, but to the extent it does, Southern Bell objects on the basis that such a request would be unduly burdensome, oppressive, and unnecessary, and for these reasons is prohibited.

DOCUMENT NUMBER-DATE

04127 MAY-28

FPSC-RECORDS/REPORTING

### SPECIFIC RESPONSES

3. Subject to the general objections, which are incorporated by reference into the specific responses made herein, Southern Bell responds to the individual numbered requests contained in IAC's 3rd Set of Data Requests as follows:

A. In response to Request No. 1, Southern Bell objects to this request on the grounds that some of the documents responsive to this request contain proprietary confidential business information. Southern Bell will produce the documents pursuant to the protective agreement which has been executed between the parties.

B. In response to Request No. 2, Southern Bell has defined access line to mean the local channel associated with local transport restructure and expanded interconnection. Based on this definition, Southern Bell has no documents responsive to this request.

C. In response to Request No. 3, Southern Bell has no documents responsive to this request.

D. In response to Request No. 4, Southern Bell objects to this request on the grounds that the request is overly broad and not sufficiently limited in scope as the request is not limited to expanded interconnection and local transport restructure. Therefore, the request is unduly burdensome. Further, portions of the request are irrelevant and thus not likely to lead to the discovery of admissible evidence. Lastly, Southern Bell objects to this request on the grounds that some of the documents

responsive to this request contain proprietary confidential business information. Without waiving its objections, Southern Bell will produce documents responsive to this request pertaining to switched interconnection, local transport restructure and switched access services pursuant to the protective agreement which has been executed between the parties.

E. In response to Request No. 5, Southern Bell has no documents responsive to this request.

F. In response to Request No. 6, Southern Bell has no documents responsive to this request.

G. In response to Request No. 7, Southern Bell objects to this request on the grounds that some of the documents responsive to this request contain proprietary confidential business information. Southern Bell will produce the documents responsive to this request pursuant to the protective agreement which has been executed between the parties.

H. In response to Request No. 8, Southern Bell has no documents responsive to this request.

I. In response to Request No. 9, Southern Bell objects to this request on the grounds that some of the documents responsive to this request contain proprietary confidential business information. Southern Bell will produce these documents pursuant to the protective agreement which has been executed between the parties.

J. In response to Request No. 10, Southern Bell objects to this request on the grounds that some of the documents responsive

to this request contain proprietary confidential business. Southern Bell will produce these documents pursuant to the protective agreement which has been executed between the parties.

K. In response to Request No. 11, Southern Bell objects to this request on the grounds that the request is overly broad and not sufficiently limited in scope as the request is not limited to expanded interconnection and local transport restructure. Therefore, the request is unduly burdensome. Further, portions of the request are irrelevant and thus not likely to lead to the discovery of admissible evidence. Lastly, Southern Bell objects to this request on the grounds that some of the documents responsive to this request contain proprietary confidential business information. Without waiving its objections, Southern Bell will produce documents responsive to this request pertaining to switched interconnection, local transport restructure and switched access services pursuant to the confidentiality agreement which has been executed between the parties.

L. In response to Request No. 12, Southern Bell has provided all documents responsive to this request in response to Request No. 10.

M. In response to Request No. 13, Southern Bell will produce the documents responsive to this request.

N. In response to Request No. 14, Southern Bell objects to this request on the grounds that some of the documents responsive to this request contain proprietary confidential business information. Southern Bell will produce the documents responsive

to this request pursuant to the protective agreement which has been executed between the parties.

O. In response to Request No. 15, Southern Bell has no documents responsive to this request.

Respectfully submitted this 2nd day of May, 1994.

BELLSOUTH TELECOMMUNICATIONS, INC.  
d/b/a SOUTHERN BELL TELEPHONE AND  
TELEGRAPH COMPANY

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**CERTIFICATE OF SERVICE**  
**Docket No. 921074-TF**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this 2nd day of May, 1994, to:

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