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December 26, 1995

VIA AIRBORNE EXPRESS

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

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FLORIDA PUBLIC
SERVICE COMMISSION
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Re: Docket No. 950985-TP
Docket No. 950985A-TP
Docket No. 950985B-TP
Docket No. 950985C-TP
Docket No. 950985D-TP

Dear Mrs. Bayo:

Enclosed for filing in the above referenced docket(s) are an original and fifteen (15) copies of AT&T's Objections to BellSouth Telecommunications, Inc.'s First Set of Interrogatories; and an original and fifteen (15) copies of AT&T's Objections to BellSouth's Inc.'s Revised First Request for Production of Documents.

Also enclosed is an extra copy of each. Please date stamp the extra copies and return in the enclosed self-addressed envelope.

Yours truly,

Robin D. Dunson
Robin D. Dunson

Enclosures

cc: J. P. Spooner, Jr.
Parties of Record

- CK
- FA _____
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13054 DEC 27 1995 13055 DEC 27 1995

FEDERAL BUREAU OF RECORDS

FPSC-RECORDS/REPORTING BSC-RECORDS/REPORTING

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of petition(s))
to establish nondiscriminatory)
rates, terms, and conditions for)
interconnection involving local)
exchange companies and alternative)
local exchange companies pursuant)
to Section 364.162, Florida)
Statutes)

Docket No. 950985-TP
Docket No. 950985A-TP
Docket No. 950985B-TP
Docket No. 950985C-TP
Docket No. 950985D-TP

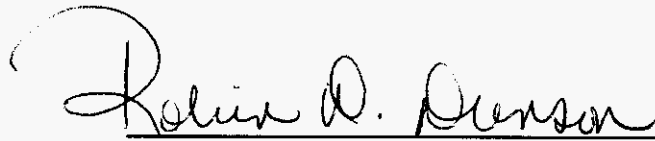
Filed: December 27, 1995

FILE COPY

NOTICE OF SERVICE

AT&T Communications of the Southern States, Inc. ("AT&T"),
by and through its undersigned attorney, hereby serves this
notice that AT&T served its Objections to BellSouth
Telecommunications, Inc.'s First Set of Interrogatories on
December 26, 1995.

Respectfully submitted,



Robin D. Dunson
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(404) 810-8689

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

DOCUMENT NUMBER-DATE

13054 DEC 27 1995

FPSC-RECORDS/REPORTING

910

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of petition(s))
to establish nondiscriminatory) Docket No. 950985-TP (Teleport)
rates, terms, and conditions for) Docket No. 950985A-TP (Continental)
interconnection involving local) Docket No. 950985B-TP (MFS)
exchange companies and alternative) Docket No. 950985C-TP (MCImetro)
local exchange companies pursuant) Docket No. 950985D-TP (Time Warner)
to Section 364.162, Florida)
Statutes) Served: December 26, 1995
)

AT&T'S OBJECTIONS TO BELLSOUTH TELECOMMUNICATIONS, 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 BELLSOUTH Telecommunications, Inc.'s (hereinafter "BELLSOUTH")
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 ten-day
requirement set forth in Order No. PSC-95-1084-PCO-TP issued by the
Florida Public Service Commission (hereinafter the "Commission") in
the above-referenced docket on August 30, 1995. 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 BELLSOUTH. Moreover, should AT&T
determine that a Protective Order is necessary with respect to any
of the material requested by BELLSOUTH, 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 BELLSOUTH.

General Objections

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

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

Paragraph 1: AT&T objects to the definitions of "you" and "your" 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 BELLSOUTH's interrogatories should be taken to mean AT&T Communications of the Southern States, Inc.

2. Unless otherwise indicated, AT&T has interpreted BELLSOUTH'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 BELLSOUTH'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 BELLSOUTH'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 BELLSOUTH'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 BELLSOUTH 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 BELLSOUTH'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 any portion of the interrogatory which may call for information pertaining to entities other than AT&T Communications of the Southern States, Inc. on the grounds that such request is irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. Moreover, to the extent that BELLSOUTH was also a party to any of the dockets or negotiations upon which this request is based, AT&T objects to the interrogatory on the grounds that the request is unduly burdensome and oppressive, inasmuch as the requested information is already available to BELLSOUTH through its participation in the subject proceeding.

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

INTERROGATORY NO. 3: 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 any portion of the interrogatory which may call for information pertaining to entities other than AT&T Communications of the Southern States, Inc., on the grounds that such request is irrelevant, overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. Moreover, to the extent BELLSOUTH is also a party to such docket or agreement, on which this request is based, AT&T objects to the interrogatory

on the grounds that the request is unduly burdensome and oppressive inasmuch as the requested information is already available to BELLSOUTH through its status as a party to such docket or agreement. To the extent that AT&T's Answer to this interrogatory contains proprietary confidential business information, AT&T will allow counsel for BELLSOUTH to inspect such information only upon execution of an appropriate Protective Agreement.

INTERROGATORY NO. 4: Same objection as Interrogatory No. 3.

INTERROGATORY NO. 5: Same objection as Interrogatory No. 3.

INTERROGATORY NO. 6: Same objection as Interrogatory No. 3.

INTERROGATORY NO. 7: Same objection as Interrogatory No. 3.

INTERROGATORY NO. 9: Same objection as Interrogatory No. 3.

SUBMITTED this 26th day of December, 1995.



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

CERTIFICATE OF SERVICE

DOCKET NO. 950985-TP

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by next day express mail, U. S. Mail or hand-delivery to the following parties of record this 26th day of December, 1995.

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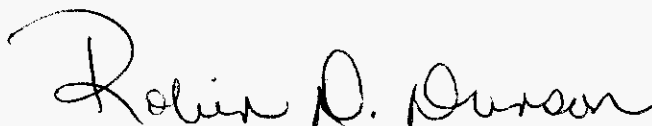
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