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January 4, 1996

VIA AIRBORNE EXPRESS

**ORIGINAL
FILE COPY**

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

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 Responses, Objections, and Motion for Protective Order, and Notice of Service, with Respect to BellSouth Telecommunications, Inc.'s Revised First Request for Production of Documents. Also enclosed for filing are an original and fifteen (15) copies of AT&T's Answers, Objections, and Motion for Protective Order with Respect to BellSouth Telecommunications, Inc.'s First Set of Interrogatories.

An extra copy of each is included. 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

- ACK
- AFA
- APP
- CAF
- CMU *Chen*
- CTR
- EAG
- LEO
- LIN
- OFC
- RCH
- SEC
- WAS
- OTM

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FPSC BUREAU OF RECORDS

RECEIVED
DOCUMENT NUMBER-DATE
00194 JAN-5 96
FPSC-RECORDS/REPORTING

DOCUMENT NUMBER-DATE

00195 JAN-5 96

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL
FILE COPY

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 (Teleport)
Docket No. 950985A-TP (Continental)
Docket No. 950985B-TP (MFS)
Docket No. 950985C-TP (MCImetro)
Docket No. 950985D-TP (Time Warner)

Served: January 4, 1996

AT&T'S ANSWERS, OBJECTIONS, AND MOTION FOR PROTECTIVE
ORDER WITH RESPECT TO BELL SOUTH 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 Answers, Objections, and Motion for Protective Order with respect to BellSouth Telecommunications, Inc.'s (hereinafter "BellSouth") First Set of Interrogatories to AT&T Communications of the Southern States, Inc. dated December 14, 1995.

OBJECTIONS AND MOTION FOR PROTECTIVE ORDER

Pursuant to the terms of Order No. PSC-95-1084-PCO-TP issued by the Florida Public Service Commission ("Commission") in the above-referenced docket on August 30, 1995, AT&T served its Objections to BellSouth's First Set of Interrogatories on December 26, 1995. A copy of such Objections is attached hereto and incorporated herein by specific reference thereto. AT&T's objections are submitted pursuant to the authority contained in Slatnick v. Leadership Housing Systems of Florida, Inc., 368 So.2d 79 (Fla. 3d DCA 1979). To the extent that a Motion for Protective Order is required, the

DOCUMENT NUMBER-DATE

00194 JAN-5 96

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objections attached hereto and incorporated herein by specific reference thereto are to be construed as a request for a protective order.

ANSWERS TO SPECIFIC INTERROGATORIES

Subject to and without waiver of its General Objections, Specific Objections, or Motion for Protective Order, AT&T submits the following Answers to specific interrogatories.

AT&T'S ANSWERS, OBJECTIONS AND MOTION
FOR PROTECTIVE ORDER WITH RESPECT TO
BELLSOUTH'S FIRST SET OF INTERROGATORIES
DATED DECEMBER 14, 1995
DOCKET NOS. 950985-TP, 950985A-TP, 950985B-TP,
950985C-TP, 950985D-TP

INTERROGATORY NO. 1

Has AT&T been a party to local interconnection dockets or negotiations in states other than Florida?

RESPONSE:

Yes.

**The above response is made in accordance with and subject to AT&T's
Objections which were served on BellSouth on December 26, 1995.**

Provided by: G. R. Follensbee, Director
AT&T
1200 Peachtree Street, NE
Atlanta, Georgia 30309

**AT&T'S ANSWERS, OBJECTIONS AND MOTION
FOR PROTECTIVE ORDER WITH RESPECT TO
BELLSOUTH'S FIRST SET OF INTERROGATORIES
DATED DECEMBER 14, 1995
DOCKET NOS. 950985-TP, 950985A-TP, 950985B-TP,
950985C-TP, 950985D-TP**

INTERROGATORY NO. 2

If the answer to Interrogatory No. 1 is affirmative, please provide the name of each state in which such dockets or negotiations have occurred.

RESPONSE:

Georgia, North Carolina, South Carolina

**The above response is made in accordance with and subject to AT&T's
Objections which were served on BellSouth on December 26, 1995.**

Provided by: G. R. Follensbee, Director
AT&T
1200 Peachtree Street, NE
Atlanta, Georgia 30309

AT&T'S ANSWERS, OBJECTIONS AND MOTION
FOR PROTECTIVE ORDER WITH RESPECT TO
BELLSOUTH'S FIRST SET OF INTERROGATORIES
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950985C-TP, 950985D-TP

INTERROGATORY NO. 3

For each state listed in response to Interrogatory No. 2, please provide the following information:

- (a) the docket number and other identifying information if the matter was a docketed proceeding;
- (b) whether an order was rendered and the date of the order;
- (c) if an order was rendered, whether it was for an interim/temporary or permanent arrangement for interconnection;
- (d) if an order was rendered, the date it is to be implemented, of if already implemented, the date of implementation;
- (e) identify all parties or persons participating in the docket;
- (f) if an order was issued, list the technical arrangements contained therein, including the location (s) at which local interconnection is allowed (e.g., tandem, end office, etc.);
- (g) if an order was issued, list each rate associated with the technical arrangements listed in response to Interrogatory 3(f);
- (h) if an order was issued, identify whether the rate mechanism for local interconnection was 1) usage based; 2) flat rate based; 3) bill and keep; or 4) other (specify);
- (i) if the rate mechanism for local interconnection is usage based or flat rate based, identify the specific rates(s).

**AT&T'S ANSWERS, OBJECTIONS AND MOTION
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DOCKET NOS. 950985-TP, 950985A-TP, 950985B-TP,
950985C-TP, 950985D-TP**

RESPONSE:

(a) Georgia - Docket No. 5958-U, Interconnection, Unbundling, and Resale of Telecommunications Services

North Carolina - Docket No. P-100, SUB 133, Local Exchange and Local Exchange Access Telecommunications Competition

South Carolina - Docket No. 93-036-C, Generic Proceeding to Review Intrastate Open Network Architecture (ONA) Services

(b) BellSouth is a party to each of the three dockets identified in (b), and thus is in possession of all relevant information pertaining to these dockets.

(c) BellSouth is a party to each of the three dockets identified in (b), and thus is in possession of all relevant information pertaining to these dockets.

(d) BellSouth is a party to each of the three dockets identified in (b), and thus is in possession of all relevant information pertaining to these dockets.

(e) BellSouth is a party to each of the three dockets identified in (b), and thus is in possession of all relevant information pertaining to these dockets.

(f) BellSouth is a party to each of the three dockets identified in (b), and thus is in possession of all relevant information pertaining to these dockets.

(g) BellSouth is a party to each of the three dockets identified in (b), and thus is in possession of all relevant information pertaining to these dockets.

(h) BellSouth is a party to each of the three dockets identified in (b), and thus is in possession of all relevant information pertaining to these dockets.

**AT&T'S ANSWERS, OBJECTIONS AND MOTION
FOR PROTECTIVE ORDER WITH RESPECT TO
BELLSOUTH'S FIRST SET OF INTERROGATORIES
DATED DECEMBER 14, 1995
DOCKET NOS. 950985-TP, 950985A-TP, 950985B-TP,
950985C-TP, 950985D-TP**

(i) BellSouth is a party to each of the three dockets identified in (b), and thus is in possession of all relevant information pertaining to these dockets.

**The above response is made in accordance with and subject to AT&T's
Objections which were served on BellSouth on December 26, 1995.**

**Provided by: G. R. Follensbee, Director
AT&T
1200 Peachtree Street, NE
Atlanta, Georgia 30309**

**AT&T'S ANSWERS, OBJECTIONS AND MOTION
FOR PROTECTIVE ORDER WITH RESPECT TO
BELLSOUTH'S FIRST SET OF INTERROGATORIES
DATED DECEMBER 14, 1995
DOCKET NOS. 950985-TP, 950985A-TP, 950985B-TP,
950985C-TP, 950985D-TP**

INTERROGATORY NO. 4

If AT&T has reached an agreement for interconnection, whether in a docketed matter or otherwise, please describe in detail the provisions of the agreement, including, at a minimum, the type of information requested in Interrogatory 3(c) through (I).

RESPONSE:

AT&T has not reached an agreement for interconnection.

**The above response is made in accordance with and subject to AT&T's
Objections which were served on BellSouth on December 26, 1995.**

Provided by: Mike Guedel, Manager
 AT&T
 1200 Peachtree Street, NE
 Atlanta, Georgia 30309

**AT&T'S ANSWERS, OBJECTIONS AND MOTION
FOR PROTECTIVE ORDER WITH RESPECT TO
BELLSOUTH'S FIRST SET OF INTERROGATORIES
DATED DECEMBER 14, 1995
DOCKET NOS. 950985-TP, 950985A-TP, 950985B-TP,
950985C-TP, 950985D-TP**

INTERROGATORY NO. 5

For each state listed in response to Interrogatory No. 2, please provide the following information:

- (a) whether an order or agreement concerning universal service has been rendered and if so, the date of such order or agreement;
- (b) if an order has been rendered, or an agreement reached, the date it is to be implemented, or if already implemented, the date of implementation;
- (c) if an order has been rendered or an agreement reached, whether it was for an interim/temporary or permanent arrangement for universal service;
- (d) the affect of such an order or agreement on the local interconnection dockets or agreement if one was reached;
- (e) a summary of the terms and conditions of the order or agreement.

RESPONSE:

- (a) No order has been rendered in the states identified in response to Interrogatory No. 2.
- (b) Not applicable.
- (c) Not applicable.
- (d) Not applicable.

**AT&T'S ANSWERS, OBJECTIONS AND MOTION
FOR PROTECTIVE ORDER WITH RESPECT TO
BELLSOUTH'S FIRST SET OF INTERROGATORIES
DATED DECEMBER 14, 1995
DOCKET NOS. 950985-TP, 950985A-TP, 950985B-TP,
950985C-TP, 950985D-TP**

(e) Not applicable.

**The above responses are made in accordance with and subject to AT&T's
Objections which were served on BellSouth on December 26, 1995.**

Provided by: G. R. Follensbee, Director
AT&T
1200 Peachtree Street, NE
Atlanta, Georgia 30309

**AT&T'S ANSWERS, OBJECTIONS AND MOTION
FOR PROTECTIVE ORDER WITH RESPECT TO
BELLSOUTH'S FIRST SET OF INTERROGATORIES
DATED DECEMBER 14, 1995
DOCKET NOS. 950985-TP, 950985A-TP, 950985B-TP,
950985C-TP, 950985D-TP**

INTERROGATORY NO. 6

For each state listed in response to Interrogatory No. 2, please provide the following information:

- (a) whether an order or agreement concerning number portability has been rendered and if so, the date of such order or agreement;
- (b) identify all parties participating in any number portability docket or agreement;
- (c) a description of the mechanism ordered for number portability;
- (d) identify all rates (recurring and non-recurring residential and business) associated with the mechanism listed in 6(c);
- (e) the affect of such an order or agreement on local interconnection agreements or order.

RESPONSE:

- (a) No order has been rendered in the states identified in response to Interrogatory No. 2.
- (b) BellSouth is a party to each of the three dockets identified, and thus is in possession of all relevant information pertaining to these dockets.
- (c) Not applicable.
- (d) Not applicable.

**AT&T'S ANSWERS, OBJECTIONS AND MOTION
FOR PROTECTIVE ORDER WITH RESPECT TO
BELLSOUTH'S FIRST SET OF INTERROGATORIES
DATED DECEMBER 14, 1995
DOCKET NOS. 950985-TP, 950985A-TP, 950985B-TP,
950985C-TP, 950985D-TP**

(e) Not applicable.

**The above response is made in accordance with and subject to AT&T's
Objections which were served on BellSouth on December 26, 1995.**

Provided by: G. R. Follensbee, Director
AT&T
1200 Peachtree Street, NE
Atlanta, Georgia 30309

AT&T'S ANSWERS, OBJECTIONS AND MOTION
FOR PROTECTIVE ORDER WITH RESPECT TO
BELLSOUTH'S FIRST SET OF INTERROGATORIES
DATED DECEMBER 14, 1995
DOCKET NOS. 950985-TP, 950985A-TP, 950985B-TP,
950985C-TP, 950985D-TP

INTERROGATORY NO. 7

For each state listed in response to Interrogatory No. 2, please provide the following information:

- (a) whether an order or agreement concerning collocation has been rendered and, if so, the date of such order or agreement;
- (b) a description of the terms and conditions of the order or agreement;
- (c) identify all rates associated with the order or agreement;
- (d) the affect of such an order or agreement on the local interconnection arrangements or order.

RESPONSE:

- (a) No order has been rendered in the states identified in response to Interrogatory No. 2.
- (b) Not applicable.
- (c) Not applicable.
- (d) Not applicable.

The above response is made in accordance with and subject to AT&T's Objections which were served on BellSouth on December 26, 1995.

Provided by: G. R. Follensbee, Director
AT&T
1200 Peachtree Street, NE
Atlanta, Georgia 30309

**AT&T'S ANSWERS, OBJECTIONS AND MOTION
FOR PROTECTIVE ORDER WITH RESPECT TO
BELLSOUTH'S FIRST SET OF INTERROGATORIES
DATED DECEMBER 14, 1995
DOCKET NOS. 950985-TP, 950985A-TP, 950985B-TP,
950985C-TP, 950985D-TP**

INTERROGATORY NO. 8

For each state listed in response to Interrogatory No. 2, please provide the total number of local access lines in that state.

RESPONSE:

This information is in the possession of the incumbent local exchange companies. AT&T is thus unable to respond to the request. Bell is in a better position to determine this information than is AT&T.

Provided by: Mike Guedel, Manager
 AT&T
 1200 Peachtree Street, NE
 Atlanta, Georgia 30309

**AT&T'S ANSWERS, OBJECTIONS AND MOTION
FOR PROTECTIVE ORDER WITH RESPECT TO
BELLSOUTH'S FIRST SET OF INTERROGATORIES
DATED DECEMBER 14, 1995
DOCKET NOS. 950985-TP, 950985A-TP, 950985B-TP,
950985C-TP, 950985D-TP**

INTERROGATORY NO. 9

For each state identified in response to Interrogatory No. 2, state whether there has been a judicial appeal of any order rendered in the local interconnection docket. If your answer is in the affirmative, please identify the court in which such an appeal lies, the case number, the basis of the appeal and the current status of the appeal.

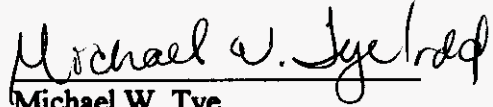
RESPONSE:

BellSouth is a party to each of the three dockets identified, and thus is in possession of all relevant information pertaining to these dockets.

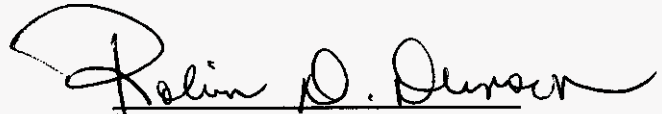
**The above response is made in accordance with and subject to AT&T's
Objections which were served on BellSouth on December 26, 1995.**

Provided by: G. R. Follensbee, Director
AT&T
1200 Peachtree Street, NE
Atlanta, Georgia 30309

SUBMITTED this 4th day of January, 1996.



Michael W. Tye
106 East College Ave.
Suite 1410
Tallahassee, FL 32301
(904) 425-6360



Robin D. Dunson
1200 Peachtree St., NE
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Atlanta, Georgia 30309
(404) 810-8689


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

AFFIDAVIT

**STATE OF GEORGIA
COUNTY OF FULTON**

BEFORE ME, the undersigned authority, personally appeared **MIKE GUEDEL** who deposed and stated that he provided the answers to Interrogatories Nos. 4 and 8 of BellSouth Telecommunications, Inc.'s First Set of Interrogatories to AT&T Communications of the Southern States, Inc. ("AT&T"), served on AT&T in Docket Nos. 950985-TP, 950985A-TP, 950985B-TP, 950985C-TP and 950985D-TP and that the responses are true and correct to the best of his information and belief.

DATED AT Atlanta, Georgia, this 4th day of January, 1996.



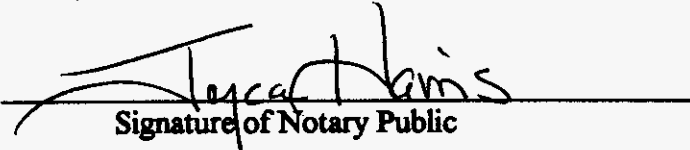
Signature of Affiant

SWORN TO AND SUBSCRIBED before me this 4th day of January, 1996.

NOTARY PUBLIC

State of Georgia

My Commission Expires: April 30, 1996



Signature of Notary Public

AFFIDAVIT

**STATE OF GEORGIA
COUNTY OF FULTON**

BEFORE ME, the undersigned authority, personally appeared **GREG R. FOLLENSBEE**, who deposed and stated that he provided the answers to Interrogatories Nos. 1, 2, 3, 5, 6, 7 and 9, of BellSouth Telecommunications, Inc.'s First Set of Interrogatories to AT&T Communications of the Southern States, Inc. ("AT&T"), served on AT&T in Docket Nos. 950985-TP, 950985A-TP, 950985B-TP, 950985C-TP and 950985D-TP and that the responses are true and correct to the best of his information and belief.

DATED AT Atlanta, Georgia, this 4th day of January, 1996.



Signature of Affiant

SWORN TO AND SUBSCRIBED before me this 4th day of January, 1996.

NOTARY PUBLIC

State of Georgia

My Commission Expires: Sara K. Burrow, Notary Public
My Commission Expires September 9, 1999



Signature of Notary Public

CERTIFICATE OF SERVICE

DOCKET 950985-TP

I hereby certify that copies of AT&T's Answers/Responses, Objections, and Motions for Protective Order have been served upon the following parties by Airborne Express, on this 14th day of January, 1996:

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Anthony P. Gillman
Kimberly Caswell
GTE Florida Incorporated
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Charles Beck
Office of the Public Counsel
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Tallahassee, FL 32399j-1400

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David Erwin
Young, van Assenderp & Varnadoe
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Laura Wilson
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Marsha Rule
Wiggins & Villacorta
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Hyperion Telecommunications, Inc.
Boyce Plaza III
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Pittsburgh, PA 15241

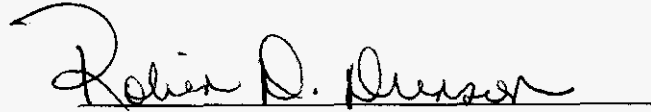
Jill Butler
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Robin D. Dunson