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August 23, 1996

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

RE: Docket No. 960916-TP

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Objections to ACSI'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,

Nancy B. White (pw)
Nancy B. White

ACK _____ Enclosures
AFA _____
APP _____ cc: All Parties of Record
CAF _____ A. M. Lombardo
SMU _____ R. G. Beatty
W. J. Ellenberg

CTR _____
EPC _____
LEG 1 _____
LIN 5 _____
GSA _____
RTH _____
SEC 1 _____
WAS _____
OTH _____

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CERTIFICATE OF SERVICE
DOCKET NO. 960916-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express this 23rd day of August, 1996 to the following:

Staff Counsel
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Commission
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Nancy B. White (ps)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of)
)
Petition by American)
Communications Services, Inc.)
and American Communications)
Services of Jacksonville, Inc.)
for Arbitration with BellSouth)
Telecommunications, Inc.)
pursuant to the)
Telecommunications Act of 1996)
_____)

Docket No. 960916-TP

Filed: August 23, 1996

BELLSOUTH TELECOMMUNICATIONS, INC.'S
OBJECTIONS TO ACSI'S FIRST SET OF INTERROGATORIES

BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), hereby files, pursuant to Rule 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 American Communication Services, Inc. and American Communications Services of Jacksonville, Inc.'s ("ACSI") First Set of Interrogatories to BellSouth.

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 procedural orders issued by the Florida Public Service Commission ("Commission") in other arbitration dockets. Should additional grounds for objection be discovered as BellSouth prepares its Answers to the above-referenced set of interrogatories, BellSouth reserves the right to supplement, revise, or modify its objections at the time that it serves its Answers on ACSI. Moreover, should BellSouth determine that a Protective Order is necessary with respect to any of the material requested by ACSI, BellSouth reserves the right to file a motion with the Commission seeking such an order.

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at the time that it serves its Answers on ACSI.

GENERAL OBJECTIONS

BellSouth makes the following General Objections to ACSI's First Set of Interrogatories which will be incorporated by reference into BellSouth's specific responses when its Answers are served on ACSI.

1. BellSouth objects to the interrogatories to the extent that such interrogatories 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 has interpreted ACSI's interrogatories to apply to BellSouth'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, BellSouth objects to such interrogatory as irrelevant, overly broad, unduly burdensome, and oppressive.

3. 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.

4. BellSouth 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 BellSouth in response to ACSI's interrogatories will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth 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. BellSouth will attempt to note each instance where this objection applies.

6. BellSouth objects to ACSI's discovery requests, instructions and definitions, insofar as they seek to impose obligations on BellSouth which exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

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

8. BellSouth objects to each and every interrogatory, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. BellSouth objects to each and every interrogatory to the extent that the information requested constitute "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that ACSI's interrogatories request proprietary confidential business information which is not subject to the "trade secrets" privilege, BellSouth will make such information available to counsel for ACSI pursuant to an appropriate Protective Agreement, subject to any other general or

specific objections contained herein.

OBJECTIONS TO SPECIFIC INTERROGATORIES

10. BellSouth objects to Interrogatory No. 1 on the grounds that the issue of whether and which interconnection agreements are available to other parties is the subject of Docket No. 960290-TP. Moreover, BellSouth objects to these requests on the basis that the requests are overly broad, oppressive and unduly burdensome. In addition, BellSouth objects to these requests on the basis that the requests do not seek information relevant to the issues in this docket nor are they reasonably calculated to lead to the discovery of admissible evidence.

11. BellSouth objects to Interrogatory Nos. 4 and 10 on the grounds that the documents requested are not relevant and are not calculated to lead to the discovery of admissible evidence. Moreover, the requests are overly broad, unduly burdensome, and oppressive. In addition, the requests seek highly sensitive competitive information.

12. BellSouth objects to that portion of Interrogatory No. 11 that requires copies of portions of the tariff, because the applicable tariffs are on file with the Florida Public Service Commission and are a matter of public record. BellSouth objects to producing physical copies of the tariffs in question to ACSI since they are equally available to ACSI.

Respectfully submitted this 23rd day of August, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.

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