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September 18, 1996

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

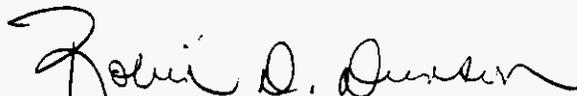
Re: Docket No. 960847-TP

Dear Mrs. Bayo:

Enclosed for filing in the above referenced docket are an original and fifteen (15) copies of AT&T's Objections to Staff's First Request for Production of Documents (Nos. 1-13) and AT&T's Objections to Staff's First Set of Interrogatories (Nos. 1-23).

Copies of the foregoing are being served on all parties of record in accordance with the attached Certificate of Service.

Yours truly,

  
Robin D. Dunson

Attachments

cc: Mike Tye  
Tracy Hatch  
Doris Franklin  
All Parties of Record

DOCUMENT NUMBER-DATE

09996 SEP 19 96

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by AT&T Communications of )  
the Southern States, Inc. for arbitration )  
of certain terms and conditions of a proposed )  
agreement with GTE Florida, Incorporated )  
concerning interconnection and resale under )  
the Telecommunications Act of 1996. )  
\_\_\_\_\_ )

Docket No. 960847-TP

Filed: September 19, 1996

AT&T'S OBJECTIONS TO STAFF'S FIRST SET OF INTERROGATORIES (NOS. 1-23)

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 the Staff of the Florida Public Service Commission's (hereinafter "Staff") 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-96-1053-PCO-TP issued by the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced docket on August 16, 1996. 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 Staff. Moreover, should AT&T determine that a Protective Order is necessary with respect to any of the material requested by Staff, 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 Staff.**

### General Objections

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

1. Unless otherwise indicated, AT&T has interpreted Staff'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.
2. 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.
3. 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 Staff's interrogatories will be provided subject to, and without waiver of, the foregoing objection.

4. 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.

5. AT&T objects to Staff'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.

6. AT&T objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

7. 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.

8. 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 Staff'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 Staff pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

SUBMITTED this 19th day of September, 1996.



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