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September 21, 1998

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

Dear Mrs. Bayo:

Re: Docket No. 980696-TP

You will find enclosed for filing in the above-referenced docket an original and fifteen (15) copies of AT&T's Objections to BellSouth's First Set of Interrogatories to AT&T; AT&T's Objections to BellSouth's Third Request for Production of Documents to AT&T; AT&T's Objections to Staff's Fourth Request for Production of Documents to AT&T and AT&T's Fourth Set of Interrogatories to AT&T.

Copies of the foregoing are being served on the parties of record in accordance with the attached certificate of service.

Yours truly,

*Tracy Hatch*  
Tracy Hatch

ACK \_\_\_\_\_  
AFA 2  
APP \_\_\_\_\_  
CAF \_\_\_\_\_ JH/mr  
CMU \_\_\_\_\_ Enclosures  
CTR \_\_\_\_\_ cc: Parties of Record

EAG \_\_\_\_\_  
LEG 2  
LIN 5  
OPC \_\_\_\_\_  
RCH \_\_\_\_\_  
SEC 1  
WAS \_\_\_\_\_  
OTH \_\_\_\_\_

4th POD  
DOCUMENT NO.  
10401-48  
9-21-98

Obj. to BS 1<sup>st</sup> Set  
DOCUMENT NUMBER-DATE  
10398 SEP 21 98  
FPSC RECORDS/REPORTING

BS's 3<sup>rd</sup> POD  
DOCUMENT NUMBER-DATE  
10399 SEP 21 98  
FPSC RECORDS/REPORTING

FPSC's 4<sup>th</sup>  
DOCUMENT NUMBER-DATE  
10400 SEP 21 98  
FPSC RECORDS/REPORTING

In re: Determination of the  
cost of basic local  
telecommunications service,  
pursuant to Section 364.025,  
Florida Statutes.

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DOCKET NO. 980696-TP

DATED: September 21, 1998

AT&T'S OBJECTIONS TO THE STAFF OF THE  
FLORIDA PUBLIC SERVICE COMMISSION'S  
FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS

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 1.350 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's") Fourth Request  
for Production of Documents 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 five-day requirement set forth in Order No. PSC-98-0813-  
PCO-TP issued by the Florida Public Service Commission  
(hereinafter the "Commission") in the above-referenced  
docket on June 19, 1998. Should additional grounds for  
objection be discovered as AT&T prepares its Responses to  
the above-referenced set of requests, AT&T reserves the

DOCUMENT NUMBER-DATE

10401 SEP 21 8

FFSC-RECORDS/REPORTING

right to supplement, revise, or modify its objections at the time that it serves its Responses. Moreover, should AT&T determine that a Protective Order is necessary with respect to any of the material requested, AT&T reserves the right to file a motion with the Commission seeking such an order at the time that it serves its Responses.

#### General Objections

AT&T makes the following General Objections to Staff's Fourth Request for Production of Documents which will be incorporated by reference into AT&T's specific responses when its Responses are served on Staff.

1. AT&T objects to the following provisions of the "Definitions" section of Staff's Fourth Request for Production of Documents 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 entity certificated to provide regulated telecommunications services in Florida and which is a party to this docket.

All references to "AT&T" in responding to Staff's request for production should be taken to mean AT&T Communications of the Southern States, Inc.

2. AT&T objects to Staff's Fourth Set of Requests for Production of Documents to the extent that it is overly broad, unduly burdensome, oppressive, not permitted by applicable discovery rules, and would require AT&T to disclose information which is privileged.

3. AT&T has interpreted Staff's requests to apply to AT&T's regulated intrastate operations in Florida and will limit its Responses accordingly. To the extent that any request is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission, AT&T objects to such request as irrelevant, overly broad, unduly burdensome, and oppressive.

4. AT&T objects to each and every request and instruction to the extent that such request or instruction calls for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege or other applicable privilege.

5. AT&T objects to each and every request 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 requests. Any Responses provided by AT&T in response to Staff's requests will be provided subject to, and without waiver of, the foregoing objection.

6. AT&T objects to each and every request 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.

7. 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.

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

9. AT&T objects to each and every request, general instruction, or definition insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

10. AT&T objects to each and every request 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 requests seek proprietary confidential business information which is not the subject of 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.

11. AT&T is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, AT&T creates countless documents that are not subject to Florida Public Service Commission or FCC retention of records requirements. These documents are kept in numerous locations and are frequently moved from site to site as employees change jobs or as the business is reorganized. Rather, these responses will provide all of the information obtained by AT&T after a reasonable and diligent search conducted in connection with this discovery request. AT&T will comply with Staff's request that a search be conducted of those files that are reasonably expected to contain the requested information. To the extent that the discovery request purports to require more, AT&T objects on the grounds that compliance would impose an undue burden or expense.

#### Objections to Specific Requests

Subject to, and without waiver of, the foregoing general objections, AT&T enters the following specific objections with respect to Staff's requests:

Request No. 24: Without waiver, AT&T intends to produce the requested documents in its possession custody or control.

Request No. 25: Without waiver, AT&T intends to produce the requested documents in its possession custody or control.

Request No. 26: Without waiver, AT&T intends to produce the requested documents in its possession custody or control.

Request No. 27: Without waiver, AT&T intends to produce the requested documents in its possession custody or control.

Request No. 28: Without waiver, AT&T intends to produce the requested documents in its possession custody or control.

Request No. 29: Without waiver, AT&T intends to produce the requested documents in its possession custody or control.

Request No. 30: Without waiver, AT&T intends to produce the requested documents in its possession custody or control.

Request No. 31: Without waiver, AT&T intends to produce the requested documents in its possession custody or control.

Request No. 32: Without waiver, AT&T intends to produce the requested documents in its possession custody or control.

Request No. 33: Without waiver, AT&T intends to produce the requested documents in its possession custody or control.

Request No. 34: Without waiver, AT&T intends to produce the requested documents in its possession custody or control.

Request No. 35: Without waiver, AT&T intends to produce the requested documents in its possession custody or control.

Request No. 36: Without waiver, AT&T intends to produce the requested documents in its possession custody or control.

Request No. 37: Without waiver, AT&T intends to produce the requested documents in its possession custody or control.

Request No. 38: Without waiver, AT&T intends to produce the requested documents in its possession custody or control.

Request No. 39: Without waiver, AT&T intends to produce the requested documents in its possession custody or control.

Request No. 40: Without waiver, AT&T intends to produce the requested documents in its possession custody or control.

NOTE: THE TITLE HEADING TO STAFF'S FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS INDICATED THAT STAFF WAS SERVING DOCUMENT REQUESTS NOS. 24-42 ON AT&T. THE COPY OF STAFF'S FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS SERVED ON AT&T INCLUDED ONLY DOCUMENT REQUESTS NOS. 24-40.

SUBMITTED this 21th day of September, 1998.

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



**CERTIFICATE OF SERVICE  
DOCKET 980696-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via \*hand delivery/\*\*Federal Express and U.S. Mail to the following parties of record on this 21st day of September, 1998:

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