

ORIGINAL

Legal Department

Nancy B. White
General Counsel - Florida

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5558

January 15, 2004

Mrs. Blanca S. Bayó
Director, Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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Re: Docket No. 030851-TP

Dear Ms. Bayó:

Today, BellSouth Telecommunications, Inc. filed its General Objections to Staff's Fourth Set of Interrogatories and Fourth Request for Production of Documents, dated January 8, 2004.

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 to the parties shown on the attached Certificate of Service.

RECEIVED & FILED

On

FPSC-BUREAU OF RECORDS

Sincerely,

Nancy B. White
Nancy B. White *APK*

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey

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**CERTIFICATE OF SERVICE
Docket No. 030851-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
Electronic Mail, Hand Delivery* and FedEx® this 15th day of January 2004 to the following:

Jeremy Susac, Staff Counsel*
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Phone: (850) 413-6212
Fax: (850) 413-6250
jsusac@psc.state.fl.us

Michael A. Gross
VP Reg. Affairs & Reg. Counsel
Florida Cable Telecomm. Assoc.
246 East 6th Avenue
Tallahassee, FL 32303
Tel. No. (850) 681-1990
Fax. No. (850) 681-9676
mgross@fcta.com

Joseph A. McGlothlin (+)
Vicki Gordon Kaufman (+)⊗
McWhirter, Reeves, McGlothlin,
Davidson, Kaufman & Arnold PA
117 South Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 222-2525
Fax. No. (850) 222-5606
Represents FCCA
Represents Covad ~
jmclothlin@mac-law.com
vkaufman@mac-law.com

Charles E. Watkins (+)
Covad Communications Company
1230 Peachtree Street, N.E.
19th Floor
Atlanta, Georgia 30309
Tel. No. (404) 942-3492
Fax. No. (404) 942-3495
gwatkins@covad.com
jbell@covad.com

Nanette Edwards, Esq. (+)
Director – Regulatory
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, AL 35802
Tel. No. (256) 382-3856
nedwards@itcdeltacom.com

Floyd Self, Esq. (+)
Norman H. Horton, Esq. ~
Messer Caparello & Self
215 South Monroe Street, Suite 701
Tallahassee, FL 32301
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Represents ITC^DeltaCom,
Represents KMC
Represents MCI
Represents Xspedius~
fself@lawfla.com
nhorton@lawfla.com

De O'Roark, Esq. (+)
MCI WorldCom Communications, Inc.
6 Concourse Parkway, Suite 3200
Atlanta, GA 30328
de.oroark@mci.com

Jon Moyle, Jr.
Moyle Law Firm (Tall)
The Perkins House
118 North Gadsden Street
Tallahassee, FL 32301
Phone: (850) 681-3828
Fax: 681-8788
Email: jmoylejr@moylelaw.com

Andrew O. Isar
Miller Isar, Inc.
7901 Skansie Avenue
Suite 240
Gig Harbor, WA 98335
Tel. No. (253) 851-6700
Fax No. (253) 851-6474
aisar@millerisar.com

Jason Spinard, Esq.
Rand Currier
Geoff Cookman
Granite Telecommunications, LLC
234 Copeland Street
Quincy, MA 02169
Tel. No. 617 847-1500
Fax No. 617 847-0931
jspinard@granitenet.com
rcurrier@granitenet.com
gcookman@granitenet.com

Donna McNulty, Esq. (+)⊗
MCI WorldCom Communications, Inc.
1203 Governors Square Blvd., Suite 201
Tallahassee, FL 32301-2960
donna.mcnulty@mci.com

Tracy Hatch, Esq.
AT&T
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
Tel. No. (850) 425-6360
thatch@att.com

Lisa A. Sapper (+)
AT&T
1200 Peachtree Street, N.E.
Suite 8100
Atlanta, GA 30309
Tel. No. (404) 810-7812
lisariley@att.com

Jake E. Jennings (+)
NewSouth Communications Corp
Two North Main Center
Greenville, SC 29601-2719
Tel. No. 864 672-5877
Fax No. 864 672-5313
jejennings@newsouth.com

Marva Brown Johnson, Esq.
KMC Telecom III, LLC
1755 North Brown Road
Lawrenceville, GA 30034-8119
marva.johnson@kmctelecom.com

Susan S. Masterton, Esq. (+)
Sprint-Florida, Inc.
Sprint Communications Co. L.P.
1313 Blair Stone Road
P.O. Box 2214
Tallahassee, FL 32316-2214
Tel. No. (850) 599-1560
Fax. No. (850) 878-0777
susan.masterton@mail.sprint.com

Charles V. Gerkin, Jr.
Regulatory Counsel
Allegiance Telecom, Inc.
9201 North Central Expressway
Dallas, TX 75231
Phone: 469-259-4051
Fax: 770 234-5945
Cell: 770 855-0466
charles.gerkin@algx.com

Terry Larkin
Allegiance Telecom, Inc.
700 East Butterfield Road
Lombard, IL 60148
Phone: (630) 522-6453
terry.larkin@algx.com

Jean Houck
Business Telecom, Inc.
4300 Six Forks Road
Raleigh, NC 27609
Tel. No. (919) 863-7325
jean.houck@btitelecom.net

Jonathan Audu
Manager, Regulatory Affairs
Supra Telecommunications
1311 Executive Center Drive
Suite 220
Tallahassee, FL 32301-5027
Tel. No. (850) 402-0510
Fax. No. (850) 402-0522
jonathan.audu@stis.com

Margaret Ring, Director
Regulatory Affairs
Network Telephone Corporation
815 S. Palafox St.
Pensacola, FL 32501
850-465-1748
Margaret.Ring@networktelephone.net

Tier 3 Communications
Kim Brown
2235 First Street, Suite 217
Ft. Myers, FL 33901-2981
Phone: (239) 689-0000
Fax: (239) 689-0001
Email: steve@tier3communications.net

Jorge Cruz-Bustillo (+)
Assistant General Counsel
Supra Telecommunications & Information
Systems, Inc.
2620 S.W. 27th Avenue
Miami, FL 33133
Phone: (305) 476-4252
Fax: (305) 443-1078
jorge.cruz-bustillo@stis.com

AT&T by E-Mail only: (+)
soniadaniels@att.com

Richard Chapkis (+)
Kimberly Caswell
Verizon Florida Inc.
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110
Phone: (813) 483-1256
Fax: (813) 273-9825
Email: richard.chapkis@verizon.com

Matthew Feil (+)
Scott Kassman
FDN Communications
390 North Orange Avenue
Suite 2000
Orlando, FL 32801-1640
Tel. No. 407 835-0460
Fax No. 407 835-0309
mfeil@mail.fdn.com
skassman@mail.fdn.com

Thomas M. Koutsky
Vice President, Law and Public Policy
Z-Tel Communications, Inc.
1200 19th Street, N.W., Ste. 500
Washington, D.C. 20036
Tel. No. (202) 955-9653
tkoutsky@z-tel.com

Charlie Beck
Deputy Public Counsel
Office of Public Counsel
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
Phone: (850) 488-9330
Fax No. (850) 488-4491
Beck.Charles@leg.state.fl.us



Nancy B White

(+)signed Protective Agreement
(*) via Hand Delivery
(⊗) via FedEx

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising)
from Federal Communications Commission) Docket No. 030851-TP
triennial UNE review: Local Circuit Switching)
for Mass Market Customers.) Filed: January 15, 2004
_____)

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
GENERAL OBJECTIONS TO
STAFF'S FOURTH SET OF INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.340 and 1.280, Florida Rules of Civil Procedure, hereby files the following General Objections to Florida Public Commission Staff's (hereinafter "Staff") Fourth Set of Interrogatories and Requests for Production of Documents, dated January 8, 2004.

The objections stated herein are preliminary in nature. Should additional grounds for objection be discovered as BellSouth prepares its answer to the above-referenced request for production of documents, BellSouth reserves the right to supplement, revise, or modify its objections at the time it serves its responses.

GENERAL OBJECTIONS

1. BellSouth objects to the interrogatories to the extent they 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 interrogatories are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. BellSouth will not be responding to discovery that seeks information from affiliate companies.

2. BellSouth objects to the interrogatories and requests for production to the extent they are intended to apply to matters other than those subject to the jurisdiction of the

Commission. BellSouth objects to such interrogatories and requests for production as being irrelevant, overly broad, unduly burdensome, and oppressive.

3. BellSouth objects to each and every interrogatory and request for production and instruction to the extent that such request or instruction calls for information that 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 and request for production insofar as the interrogatories and requests are 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 and requests for production. Any answers provided by BellSouth in response to the interrogatories and requests for production will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth objects to each and every interrogatory and request for production insofar as it is not reasonably calculated to lead to the discovery of admissible evidence and are not relevant to the subject matter of this action. BellSouth will attempt to note in its responses each instance where this objection applies.

6. BellSouth objects to providing information to the extent that such information is already in the public record before the Commission.

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

8. BellSouth objects to each and every interrogatory and request for production, insofar as any of them are unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. BellSouth is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, BellSouth creates countless documents that are not subject to Commission or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been identified in response to these requests. BellSouth will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the requests purport to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

10. BellSouth objects to each and every interrogatory and request for production to the extent that the information requested constitutes “trade secrets” pursuant to Section 90.506, Florida Statutes. BellSouth also objects to each and every request that would require the disclosure of customer specific information, the disclosure of which is prohibited by §364.24, *Florida Statutes*. To the extent that Staff requests proprietary confidential business information, BellSouth will make such information available in accordance with a protective agreement, subject to any other general or specific objections contained herein.

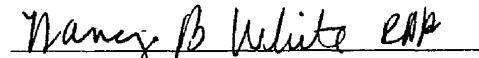
11. BellSouth also objects to any interrogatory or request to the extent that it seeks confidential information that BellSouth cannot disclose under the FCC’s Customer Proprietary Network Information (“CPNI”) rules, 47 CFR §64.2007 or under protective agreements with

CLECs to which BellSouth is a party. BellSouth will only provide CPNI and CLEC confidential information consistent with the FCC's rules and BellSouth-executed protective agreements.

12. BellSouth objects to any discovery request that seeks to obtain "all" of particular documents, items, or information to the extent that such requests are overly broad and unduly burdensome. Any answers provided by BellSouth in response to this discovery will be provided subject to, and without waiver of, the foregoing objection.

Respectfully submitted this 15th day of January, 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE

JAMES MEZA III

c/o Nancy H. Sims

150 So. Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558



R. DOUGLAS LACKEY

ANDREW D. SHORE

MEREDITH E. MAYS

General Attorneys

Suite 4300, BellSouth Center

675 West Peachtree St., N.E.

Atlanta, Georgia 30375

(404) 335-0750