

NANCY B. WHITE  
General Counsel-Florida

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

October 4, 1999

ORIGINAL

RECORDS AND REPORTING

93 OCT -4 PM 4: 34

RECEIVED-FPSC

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

Re: Docket No. 980119-TP (Supra Complaint)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Objections to Staff's First Set of Interrogatories (Nos. 1 - 27) served on September 24, 1999, which we ask that you file 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 to the parties shown on the attached Certificate of Service.

Sincerely,

*Nancy B. White (re)*  
Nancy B. White

cc: All parties of record  
Marshall M. Criser III  
R. Douglas Lackey

- AFA
- APP Bell
- CAF
- CMU 2
- CTR
- EAG
- LEG 1
- MAS 3
- OPC
- PAI
- SEC 1
- WAW
- OTH

RECEIVED & FILED

14  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

11947 OCT-4 99

FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE  
Docket No. 980119-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served  
by U.S. Mail this 4th day of October, 1999 to the following:

Beth Keating  
Legal Counsel  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
Tel No. (850) 413-6212  
Fax No. (850) 413-6250

David V. Dimlich, Esq.  
Legal Counsel  
Supra Telecommunications &  
Information Systems, Inc.  
2620 S.W. 27<sup>th</sup> Avenue  
Miami, FL 33133  
Tel. No. (305) 476-4235  
Fax. No. (305) 443-1078

Nancy B. White (cc)  
Nancy B. White

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Supra )  
Telecommunications and Information )  
Systems, against BellSouth )  
Telecommunications, Inc. for )  
violation of the )  
Telecommunications Act of 1996; )  
petition for resolution of )  
disputes as to implementation )  
and interpretation of )  
interconnection, resale and )  
collocation agreements; and )  
petition for emergency relief. )  
\_\_\_\_\_ )

Docket No.: 980119-TP

ORIGINAL

Filed: October 4, 1999

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

BellSouth Telecommunications, Inc., ("BellSouth" or "Company"), hereby files, pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.340, 1.350 and 1.280, Florida Rules of Civil Procedure, the following Objections to the Staff of the Florida Public Service Commission's ("Staff") First Set of Interrogatories (Nos. 1 - 27) served on September 24, 1999.

The objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the 10-day requirement. Should additional grounds for objection be discovered as BellSouth prepares its answers to the above-referenced interrogatories, BellSouth reserves the right to supplement, revise, or modify its objections at the time it serves its answers. Moreover, should BellSouth determine that a Protective Order is necessary with respect to any of the requested information, BellSouth reserves the right to file a

DOCUMENT NUMBER-DATE

11947 OCT-4 8

FPSC-RECORDS/REPORTING

motion with the Commission seeking such an order at the time that it serves its answers.

### **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 requests are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. BellSouth objects to the interrogatories to the extent they are intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission. BellSouth objects to such interrogatories as being 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 interrogatories 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 this request. Any answers provided by BellSouth in response to these interrogatories will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth objects to each and every interrogatory insofar as the interrogatory 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 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 Florida Public Service Commission.

7. BellSouth 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. BellSouth also objects to each and every interrogatory that would require the disclosure of customer specific information, the disclosure of which is prohibited by Section 364.24, Florida Statutes. To the extent that Staff requests proprietary information that is not subject to the "trade secrets" privilege or to Florida Statutes Section 364.24, BellSouth will make such information available to Staff subject to a Request for Confidential Classification.

8. BellSouth objects to the Staff's discovery request, 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.

9. BellSouth objects to each and every interrogatory, insofar as they are unduly burdensome, expensive, oppressive, or excessively time consuming as written.

10. 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 Florida Public Service 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 interrogatories. BellSouth will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the interrogatories purport to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

#### **SPECIFIC OBJECTIONS**

1. In addition to the general objections made above, and with respect to Interrogatory No. 1(d), BellSouth objects to identifying any CLEC which is held as proprietary information. To that extent, BellSouth will provide information about problems, if any problems have been reported at a mutually convenient time and place subject to a Notice of Intent to Request Specified Confidential Classification.

2. In addition to the general objections made above, and with respect to Interrogatory No. 3, BellSouth objects to identifying any CLEC which is held as proprietary information. To that extent, BellSouth will provide a breakdown showing X number of CLECs have submitted X orders via TAG over X months at

a mutually convenient time and place subject to a Notice of Intent to Request Specified Confidential Classification.

3. In addition to the general objections made above, and with respect to Interrogatory No. 4, BellSouth objects to identifying any CLEC which is held as proprietary information. To that extent, BellSouth will provide the number of CLECs currently using TAG for pre-ordering at a mutually convenient time and place subject to a Notice of Intent to Request Specified Confidential Classification.

4. In addition to the general objections made above, and with respect to Interrogatory No. 6, BellSouth objects to identifying any CLEC which is held as proprietary information. To that extent, BellSouth will provide the number of CLECs (and/or the number of individuals) that have attended TAG training at a mutually convenient time and place subject to a Notice of Intent to Request Specified Confidential Classification.

Respectfully submitted this 4th day of October, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White (ke)

NANCY B. WHITE

MICHAEL P. GOGGIN

c/o Nancy H. Sims

150 So. Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558

R. Douglas Lackey (ke)

R. DOUGLAS LACKEY

E. EARL EDENFIELD, JR.

Suite 4300

675 W. Peachtree St., NE

Atlanta, GA 30375

(404) 335-0747

181015