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December 22, 1995

Ms. Blanca Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
Room 110, Easley Building
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

BY HAND DELIVERY

Re: Docket No. 950984-TP

Dear Ms. Bayo:

Enclosed for filing are an original and 15 copies of WorldCom, Inc. d/b/a LDDS WorldCom Communications' Objections to BellSouth Telecommunications, Inc.'s First Set of Interrogatories and First Request for Production of Documents in the above-referenced docket.

Please indicate receipt of this document by stamping the enclosed extra copy of this letter.

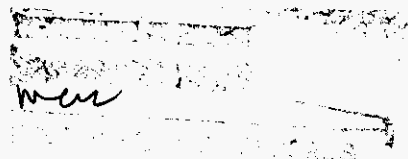
Your attention to this filing is appreciated.

Sincerely,

Floyd R. Self

Chase

FRS/amb
Enclosures
cc: Mr. Brian Sulmonetti
Parties of Record



DOCUMENT NUMBER-DATE

12970 DEC 22 95

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of petition(s))
to establish unbundled services,)
network features, functions or) Docket 950984-TP
capabilities, and local loops) Filed: December 22, 1995
pursuant to Section 364.161,)
Florida Statutes)
_____)

WORLDCOM, INC. d/b/a LDDS WORLDCOM COMMUNICATIONS'
OBJECTIONS TO BELL SOUTH TELECOMMUNICATIONS, INC.'S
FIRST SET OF INTERROGATORIES

WorldCom, Inc. d/b/a LDDS WorldCom Communications ("LDDS WorldCom"), 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 First Set of Interrogatories from BellSouth Telecommunications, Inc. ("BellSouth").

The Objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the requirement set forth in Order No. PSC-95-1083-PCO-TP issued by the Florida Public Service Commission ("FPSC") in the above-referenced docket on August 30, 1995.

GENERAL OBJECTIONS

LDDS WorldCom makes the following General Objections to BellSouth's First Set of Interrogatories which are also incorporated by reference into specific responses.

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

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1. LDDS WorldCom objects to any interrogatory that is intended to apply to matters other than operations in Florida on the basis that such interrogatory is irrelevant, overly broad, unduly burdensome, and oppressive.

2. LDDS WorldCom objects to each 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.

3. LDDS WorldCom objects to each 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.

4. LDDS WorldCom objects to each discovery request insofar as each seeks to impose obligations which exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

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

SPECIFIC OBJECTIONS

1. LDDS WorldCom objects to this interrogatory on the basis that the request relates to operations in jurisdictions other than

Florida and are irrelevant, overly broad and unduly burdensome. Further the interrogatory does not relate to any issue in this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

2. LDDS WorldCom objects to this interrogatory on the basis that the request relates to operations in jurisdictions other than Florida and are irrelevant, overly broad and unduly burdensome. Further the interrogatory does not relate to any issue in this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

3. LDDS WorldCom objects to this interrogatory on the basis that the request relates to operations in jurisdictions other than Florida and are irrelevant, overly broad and unduly burdensome. Further the interrogatory does not relate to any issue in this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

4. LDDS WorldCom objects to this interrogatory on the basis that the request relates to operations in jurisdictions other than Florida and are irrelevant, overly broad and unduly burdensome. Further the interrogatory does not relate to any issue in this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

5. LDDS WorldCom objects to this interrogatory on the basis that the request relates to operations in jurisdictions other than Florida and are irrelevant, overly broad and unduly burdensome. Further the interrogatory does not relate to any issue in this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

6. LDDS WorldCom objects to this interrogatory on the basis that the request relates to operations in jurisdictions other than Florida and are irrelevant, overly broad and unduly burdensome. Further the interrogatory does not relate to any issue in this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

7. LDDS WorldCom objects to this interrogatory on the basis that the request is vague, overly broad, unduly burdensome, not relevant to the subject matter of this case and not reasonably calculated to lead to discovery of admissible evidence.

8. LDDS WorldCom objects to this interrogatory on the basis that the request is vague, overly broad, unduly burdensome, not relevant to the subject matter of this case and not reasonably calculated to lead to discovery of admissible evidence.

9. LDDS WorldCom objects to this interrogatory on the basis that the request relates to operations in jurisdictions other than

Florida and are irrelevant, overly broad and unduly burdensome. Further the interrogatory does not relate to any issue in this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

10. LDDS WorldCom objects to this interrogatory on the basis that the request relates to operations in jurisdictions other than Florida and are irrelevant, overly broad and unduly burdensome. Further the interrogatory does not relate to any issue in this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

11. LDDS WorldCom objects to this interrogatory on the basis that the request relates to operations in jurisdictions other than Florida and are irrelevant, overly broad and unduly burdensome. Further the interrogatory does not relate to any issue in this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Respectfully submitted this 22nd day of December, 1995.

Respectfully submitted,

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of petition(s))
to establish unbundled services,)
network features, functions or) Docket 950984-TP
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pursuant to Section 364.161,)
Florida Statutes)
_____)

**WORLDCOM, INC. d/b/a LDDS WORLDCOM COMMUNICATIONS'
OBJECTIONS TO BELL SOUTH TELECOMMUNICATIONS, INC.'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

WorldCom, Inc. d/b/a LDDS WorldCom Communications ("LDDS WorldCom"), pursuant to Rules 25-22.034 and 25-22.035, Florida Administrative Code, and Rules 1.280 and 1.350, Florida Rules of Civil Procedure, hereby submits the following Objections to the First Request for Production of Documents from BellSouth Telecommunications, Inc. ("BellSouth").

The Objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the requirement set forth in Order No. PSC-95-1083-PCO-TP issued by the Florida Public Service Commission ("FPSC") in the above-referenced docket on August 30, 1995.

SPECIFIC OBJECTIONS

1. LDDS WorldCom objects to this production request on the basis that the request relates to operations in jurisdictions other than Florida and are irrelevant, overly broad and unduly burdensome. Further the production request does not relate to any

issue in this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

2. LDDS WorldCom objects to this production request on the basis that the request relates to operations in jurisdictions other than Florida and are irrelevant, overly broad and unduly burdensome. Further the production request does not relate to any issue in this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

3. LDDS WorldCom objects to this production request on the basis that the request is vague, overly broad, unduly burdensome, not relevant to the subject matter of this case and not reasonably calculated to lead to discovery of admissible evidence. In addition, LDDS further objects to this production request to the extent it seeks confidential and proprietary business information including, but not limited to, the company's business and marketing plans.

4. LDDS WorldCom objects to this production request on the basis that the request is vague, overly broad, unduly burdensome, not relevant to the subject matter of this case and not reasonably calculated to lead to discovery of admissible evidence. In addition, LDDS further objects to this production request to the extent it seeks confidential and proprietary business information

including, but not limited to, the company's business and marketing plans.

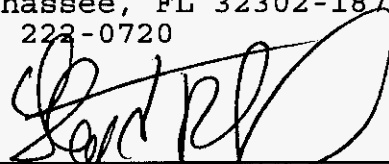
5. LDDS WorldCom objects to this production request on the basis that the request is vague, overly broad, unduly burdensome, not relevant to the subject matter of this case and not reasonably calculated to lead to discovery of admissible evidence. In addition, LDDS further objects to this production request to the extent it seeks confidential and proprietary business information including, but not limited to, the company's business and marketing plans.

6. LDDS WorldCom objects to this production request on the basis that the request is vague, overly broad, unduly burdensome, not relevant to the subject matter of this case and not reasonably calculated to lead to discovery of admissible evidence.

Respectfully submitted this 22nd day of December, 1995.

Respectfully submitted,

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FLOYD R. SELF, ESQ.
NORMAN H. HORTON, JR., ESQ.

Attorneys for WorldCom, Inc. d/b/a
LDDS WorldCom Communications

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of LDDS WorldCom's Objections to BellSouth's First Request for Production of Documents and First Set of Interrogatories in Docket No. 950984-TP has been furnished by Hand Delivery (*) and/or U. S. Mail on this 22nd day of December, 1995 to the following parties of record:

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