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ORIGINAL
FILE COPY

December 22, 1995

Via Federal Express

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

Re: Resolution of Petition(s) to establish nondiscriminatory rates, terms, and conditions for resale involving local exchange companies and alternative local exchange companies pursuant to Section 364.161, Florida Statutes (Docket No. 950984A-TP)

Dear Mrs. Bayo:

Enclosed for filing are an original and one copy of Metropolitan Fiber Systems of Florida, Inc.'s Objections to BellSouth Telecommunications, Inc.'s First Set of Interrogatories and First Request for Production of Documents in the above-captioned docket.

Also enclosed is an extra copy. Please date stamp the extra copy and return it in the enclosed self-addressed envelope.

Thank you for your attention to this matter.

Sincerely,

James C. Falvey
James C. Falvey

cc: All parties of record

- ACK
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DOCUMENT NUMBER-DATE

12994 DEC 26 1995

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**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

Resolution of Petition(s) to establish nondiscriminatory rates, terms, and conditions for resale involving local exchange companies and alternative local exchange companies pursuant to Section 364.161, Florida Statutes)
) Docket No. 950984A-TP
)
) Dated: December 22, 1995
)
)
)

**METROPOLITAN FIBER SYSTEMS OF FLORIDA, INC.'S OBJECTIONS TO
BELLSOUTH TELECOMMUNICATIONS, INC.'S FIRST SET OF
INTERROGATORIES AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

COMES NOW, Metropolitan Fiber Systems of Florida, Inc. ("MFS-FL"), and pursuant to Rules 1.340 and 1.280(b), Florida Rules of Civil Procedure, and Rules 25-22.034 and 25-22.035, Florida Administrative Code, hereby submits the following objections to BellSouth Telecommunications, Inc.'s First Set of Interrogatories and First Request for Production of Documents in the above-captioned docket. MFS-FL reserves the right to supplement these objections at the time that it serves its answers to these discovery requests on BellSouth Telecommunications, Inc. ("BellSouth"). MFS-FL also reserves the right to request confidential treatment of any or all of the requested information and documents, and accordingly reserves the right to file a motion with the Commission seeking a protective order at the time that it serves its responses on BellSouth.

General Objections to BellSouth Interrogatories and Document Requests

MFS makes the following general objections to BellSouth's First Set of Interrogatories and First Request for Production of Documents ("Discovery Requests"):

DOCUMENT NUMBER-DATE
12994.DEC 26 1995
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1. MFS-FL objects to the Discovery Requests to the extent that they seek privileged or confidential information or documents, including information encompassed by the attorney-client privilege, the work product doctrine, or trade secrets protected pursuant to Section 90.506, Florida Statutes.

2. MFS-FL objects to these Discovery Requests to the extent that they seek information or documents beyond the scope of discovery as described by Rule 1.280, Florida Rules of Civil Procedure, or otherwise not permitted by the Florida Rules of Civil Procedure.

3. MFS-FL objects to these Discovery Requests to the extent that they seek information or documents which are duplicative, oppressive, burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

4. MFS-FL objects to these Discovery Requests to the extent that they are vague, ambiguous, or overbroad.

5. As used herein, all objections as to relevancy shall mean that the information or documents requested are irrelevant to the subject matter involved in the pending action and are not reasonably calculated to lead to the discovery of admissible evidence.

6. MFS-FL objects to the Discovery Requests to the extent that they seek information or documents not in the possession, custody, or control of MFS-FL, or to which BellSouth has equal access.

7. MFS-FL objects to the Discovery Requests as burdensome to the extent that they seek information or documents that are publicly available.

8. By responding to these Discovery Requests, MFS-FL neither admits nor concedes the appropriateness or accuracy of the words or definitions in the Discovery Requests. MFS-FL will respond to the Discovery Requests to the extent it does not object

thereto, in accordance with relevant provisions of law and according to its understanding of the fair and reasonable meaning of the Discovery Requests where possible.

Specific Objections to Interrogatories

Interrogatory No. 2: MFS-FL objects to the extent that this interrogatory seeks information which is duplicative, oppressive, burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. MFS-FL further objects to the extent that this interrogatory seeks information or documents not in the possession, custody, or control of MFS-FL, or to which BellSouth has equal access. MFS-FL also objects to this interrogatory as burdensome to the extent that it seeks information or documents that are publicly available.

Interrogatory No. 3: MFS-FL objects to this interrogatory to the extent that it seeks privileged or confidential information, including information encompassed by the attorney-client privilege, the work product doctrine, or trade secrets protected pursuant to Section 90.506, Florida Statutes. MFS-FL also objects to this interrogatory to the extent that it is vague, ambiguous, or overbroad.

Interrogatory No. 4: MFS-FL objects to the extent that this interrogatory seeks information which is duplicative, oppressive, burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. MFS-FL further objects to the extent that this interrogatory seeks information or documents not in the possession, custody, or control of MFS-FL, or to which BellSouth has equal access. MFS-FL also objects to this interrogatory as burdensome to the extent that it seeks information or documents that are publicly available. MFS-FL

objects to this interrogatory to the extent that it seeks privileged or confidential information, including information encompassed by the attorney-client privilege, the work product doctrine, or trade secrets protected pursuant to Section 90.506, Florida Statutes.

Interrogatory No. 7: MFS-FL objects to the extent that this interrogatory seeks information which is duplicative, oppressive, burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. MFS-FL further objects to the extent that this interrogatory seeks information or documents not in the possession, custody, or control of MFS-FL, or to which BellSouth has equal access. MFS-FL also objects to this interrogatory as burdensome to the extent that it seeks information or documents that are publicly available.

Interrogatory No. 7: MFS-FL objects to the extent that this interrogatory seeks information which is duplicative, oppressive, burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. MFS-FL further objects to the extent that this interrogatory seeks information or documents not in the possession, custody, or control of MFS-FL, or to which BellSouth has equal access. MFS-FL also objects to this interrogatory as burdensome to the extent that it seeks information or documents that are publicly available. MFS-FL also objects to this interrogatory to the extent that it seeks privileged or confidential information, including information encompassed by the attorney-client privilege, the work product doctrine, or trade secrets protected pursuant to Section 90.506, Florida Statutes. MFS-FL also objects to this interrogatory to the extent that it is vague, ambiguous, or overbroad. MFS-FL objects to this interrogatory to the extent that it seeks information that is irrelevant.

Interrogatory No. 8: MFS-FL objects to the extent that this interrogatory seeks information which is duplicative, oppressive, burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. MFS-FL further objects to the extent that this interrogatory seeks information or documents not in the possession, custody, or control of MFS-FL, or to which BellSouth has equal access. MFS-FL also objects to this interrogatory as burdensome to the extent that it seeks information or documents that are publicly available. MFS-FL also objects to this interrogatory to the extent that it seeks privileged or confidential information, including information encompassed by the attorney-client privilege, the work product doctrine, or trade secrets protected pursuant to Section 90.506, Florida Statutes. MFS-FL also objects to this interrogatory to the extent that it is vague, ambiguous, or overbroad. MFS-FL objects to this interrogatory to the extent that it seeks information that is irrelevant.

Interrogatory No. 9: MFS-FL objects to the extent that this interrogatory seeks information which is duplicative, oppressive, burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. MFS-FL further objects to the extent that this interrogatory seeks information or documents not in the possession, custody, or control of MFS-FL, or to which BellSouth has equal access. MFS-FL also objects to this interrogatory as burdensome to the extent that it seeks information or documents that are publicly available.

Interrogatory No. 10: MFS-FL objects to the extent that this interrogatory seeks information which is duplicative, oppressive, burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. MFS-FL further objects to the extent that this interrogatory seeks information or documents not in the possession, custody, or control of MFS-FL, or to

which BellSouth has equal access. MFS-FL also objects to this interrogatory as burdensome to the extent that it seeks information or documents that are publicly available.

Interrogatory No. 11: MFS-FL objects to the extent that this interrogatory seeks information which is duplicative, oppressive, burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. MFS-FL further objects to the extent that this interrogatory seeks information or documents not in the possession, custody, or control of MFS-FL, or to which BellSouth has equal access. MFS-FL also objects to this interrogatory as burdensome to the extent that it seeks information or documents that are publicly available.

Specific Objections to Document Requests

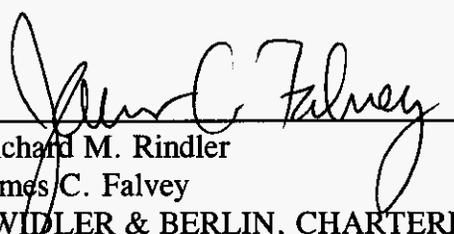
Document Request No. 3: MFS-FL objects to this document request to the extent that it is vague, ambiguous, or overbroad. MFS-FL also objects to the extent this document request seeks information which is duplicative, oppressive, burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. MFS-FL further objects to the extent that this document request seeks information or documents not in the possession, custody, or control of MFS-FL, or to which BellSouth has equal access. MFS-FL also objects to this document request as burdensome to the extent that it seeks information or documents that are publicly available. MFS-FL also objects to this document request to the extent that it seeks privileged or confidential information, including information encompassed by the attorney-client privilege, the work product doctrine, or trade secrets protected pursuant to Section 90.506, Florida Statutes.

Document Request No. 4: MFS-FL objects to this document request to the extent that it is vague, ambiguous, or overbroad. MFS-FL also objects to the extent this document request seeks information which is duplicative, oppressive, burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. MFS-FL further objects to the extent that this document request seeks information or documents not in the possession, custody, or control of MFS-FL, or to which BellSouth has equal access. MFS-FL also objects to this document request as burdensome to the extent that it seeks information or documents that are publicly available. MFS-FL also objects to this document request to the extent that it seeks privileged or confidential information, including information encompassed by the attorney-client privilege, the work product doctrine, or trade secrets protected pursuant to Section 90.506, Florida Statutes.

Document Request No. 5: MFS-FL objects to this document request to the extent that it is vague, ambiguous, or overbroad. MFS-FL also objects to the extent this document request seeks information which is duplicative, oppressive, burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. MFS-FL further objects to the extent that this document request seeks information or documents not in the possession, custody, or control of MFS-FL, or to which BellSouth has equal access. MFS-FL also objects to this document request as burdensome to the extent that it seeks information or documents that are publicly available. MFS-FL also objects to this document request to the extent that it seeks privileged or confidential information, including information encompassed by the attorney-client privilege, the work product doctrine, or trade secrets protected pursuant to Section 90.506, Florida Statutes.

Document Request No. 6: MFS-FL objects to this document request to the extent that it is vague, ambiguous, or overbroad. MFS-FL also objects to the extent this document request seeks information which is duplicative, oppressive, burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. MFS-FL further objects to the extent that this document request seeks information or documents not in the possession, custody, or control of MFS-FL, or to which BellSouth has equal access. MFS-FL also objects to this document request as burdensome to the extent that it seeks information or documents that are publicly available. MFS-FL also objects to this document request to the extent that it seeks privileged or confidential information, including information encompassed by the attorney-client privilege, the work product doctrine, or trade secrets protected pursuant to Section 90.506, Florida Statutes.

Respectfully submitted,


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Dated: December 22, 1995

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of December, a copy of the foregoing document was served, by first class mail, postage prepaid, on the following parties:

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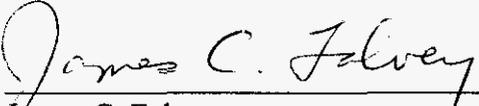
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