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February 20, 1996

ORIGINAL  
FILE COPY

BY HAND DELIVERY

Ms. Blanca S. Bayó  
Director, Records & Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Docket No. 950985-TP (Sprint-GTEFL)  
(Local Interconnection)

Dear Ms. Bayó:

Enclosed for filing on behalf of MCI Metro Access  
Transmission Services, Inc. (MCImetro) in the above referenced  
docket are the original and one copy of MCImetro's Objections to  
Sprint's First Set of Interrogatories and First Request for  
Production of Documents.

By copy of this letter this document has been provided to  
the parties on the attached service list.

Very truly yours,

*Richard D. Melson*

Richard D. Melson

- ACK
- AFA
- APP
- CAF  RDM/cc
- CMU  Enclosures
- CTR  cc: Parties of Record
- EAG
- LEG
- LIN
- OPC
- RCH
- SEC
- WAS
- OTH

RECORDED & INDEXED  
*[Signature]*  
FEB 20 1996

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following by U.S. Mail this 20th day of February, 1996.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of petition(s) )  
to establish nondiscriminatory rates, )  
terms, and conditions for ) Docket No. 950985-TP  
interconnection involving local )  
exchange companies and alternative ) Filed: February 20, 1996  
local exchange companies pursuant to )  
Section 364.162, Florida Statutes. )  
\_\_\_\_\_ )

**MCIMETRO'S OBJECTIONS TO SPRINT'S  
FIRST SET OF INTERROGATORIES AND  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

COMES NOW MCI Metro Access Transmission (MCImetro), 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 Sprint/United-Centel's First Set of Interrogatories and First Request for Production of Documents to MCImetro.

The objections stated herein are preliminary in nature and are made at this time for the purpose for complying with the ten-day requirement set forth in procedural order in this docket. Should additional grounds for objection be discovered as MCImetro prepares its answers to the above-referenced interrogatories and requests for production, MCImetro reserves the right to supplement, revise, or modify its objections at the time that it serves its answers on Sprint-United/Centel. Moreover, should MCImetro determine that a Protective Order is necessary with respect to any of the material requested by Sprint-United/Centel, MCImetro reserves the right to file a motion with the Commission

seeking such an order at the time that it serves its answers on Sprint-United/Centel.

GENERAL OBJECTIONS

MCImetro makes the following General Objections to Sprint-United/Centel's First Set of Interrogatories and First Request for Production which will be incorporated by reference into MCImetro's specific responses when those responses are served on Sprint-United/Centel.

1. MCImetro objects to the discovery requests to the extent that such requests seek to impose an obligation on MCImetro 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. MCImetro has interpreted Sprint-United/Centel's interrogatories to apply to MCImetro's intrastate operations in Florida and will limit its answers accordingly. To the extent that any discovery request is intended to apply to matters other than Florida intrastate operations, MCImetro objects to such request as irrelevant, overly broad, unduly burdensome, and oppressive.

3. MCImetro objects to each and every discovery 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.

4. MCImetro objects to each and every discovery 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 MCImetro to Sprint-United/Centel's discovery requests will be provided subject to, and without waiver of, the foregoing objection.

5. MCImetro objects to each and every discovery 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. MCImetro will attempt to note each instance where this objection applies.

6. MCImetro objects to Sprint-United/Centel's discovery requests insofar as they seek to impose obligations on MCImetro which exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

7. MCImetro objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

8. MCImetro objects to each and every discovery request, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. MCImetro objects to each and every discovery 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 Sprint-United/Centel's discovery

requests seek proprietary confidential business information which is not subject to the "trade secrets" privilege, MCImetro will consider making such information available to counsel for Sprint-United/Centel pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

10. MCImetro objects to each of the interrogatories to the extent that they seek information that is not maintained in the format requested.

11. MCImetro objects to the discovery requests to the extent that they seek information in the nature of market research. MCImetro should not be required to provide to a competitor information which MCImetro has compiled or which MCImetro has paid to have compiled and allow a competitor to have the benefit of such information.

12. MCImetro has employees located in many different locations. In the course of its business, MCImetro creates or comes into possession of countless documents that are not subject to any regulatory 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. Therefore, it is possible that not every document will be provided in response to these discovery requests. Rather, MCImetro's responses will provide all of the information obtained by MCImetro after a reasonable and diligent search conducted of those files that are reasonably expected to contain

the requested information. To the extent that the discovery request purports to require more, MCI objects on the grounds that compliance would impose an undue burden or expense.

13. MCImetro objects to every interrogatory that requests information about, or a summary of, a document which is also furnished pursuant to a document production request on the grounds that the documents speak for themselves and Sprint/United-Centel is equally capable of extracting or summarizing the requested information.

OBJECTIONS TO SPECIFIC INTERROGATORIES

Interrogatory No. 3: Pursuant to General Objection No. 13, MCImetro objects to subparts (c) to (j) of this interrogatory on the grounds that the information is available to Sprint/United-Centel from an examination of the documents covered by the related document production request.

Interrogatory No. 4: Pursuant to General Objection No. 13, MCImetro objects to this interrogatory on the grounds that the information is available to Sprint/United-Centel from an examination of the documents covered by the related document production request.

Interrogatory No. 5: Pursuant to General Objection No. 13, MCImetro objects to subparts (b) to (e) of this interrogatory on the grounds that the information is available to Sprint/United-Centel from an examination of the documents covered by the related document production request.



Interrogatory No. 6: Pursuant to General Objection No. 13, MCImetro objects to subparts (b) to (e) of this interrogatory on the grounds that the information is available to Sprint/United-Centel from an examination of the documents covered by the related document production request.

Interrogatory No. 7: Pursuant to General Objection No. 13, MCImetro objects to subparts (b) to (d) of this interrogatory on the grounds that the information is available to Sprint/United-Centel from an examination of the documents covered by the related document production request.

Interrogatory No. 8: MCImetro objects to this interrogatory on the grounds that such request is unduly burdensome and oppressive since the information is not of a type ordinarily in the possession of MCImetro and the burden on Sprint/United-Centel to develop such information is no greater than the burden on MCImetro.

Interrogatory No. 10: MCImetro objects to this interrogatory on the grounds that it calls for the disclosure of trade secrets or other highly confidential business information and is not reasonably calculated to lead to the discovery of admissible evidence.

#### OBJECTIONS TO DOCUMENT PRODUCTION REQUESTS

Request No. 1: Pursuant to the General Objections stated above, MCImetro specifically objects to this request on the grounds set forth in the individual specific objections made by

MCImetro to the related interrogatories. Such specific objections are incorporated herein by specific reference thereto.

Request No. 2: Pursuant to the General Objections stated above, MCImetro specifically objects to this request on the grounds that MCImetro may be required to "refer to or rely on" a voluminous amount of information in order to respond to the related interrogatories and this request is therefore overly broad, unduly burdensome, and oppressive.

Request Nos. 4 and 5: MCImetro objects to this request on the grounds that it calls for the disclosure of trade secrets or other highly confidential business information and is not reasonably calculated to lead to the discovery of admissible evidence.

RESPECTFULLY SUBMITTED this 20th day of February, 1996.

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