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September 29, 1995

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IN REPLY REFER TO:

Tallahassee

BY HAND DELIVERY

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

Re: Number Portability; Docket No. 950737-TP

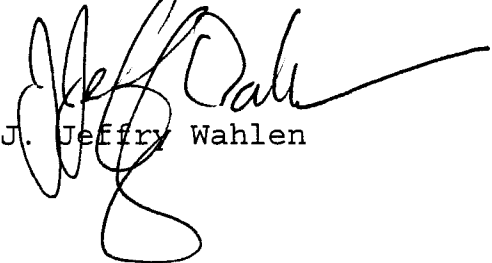
Dear Ms. Bayo:

Enclosed for filing in the above-styled docket are the original and fifteen (15) copies of United Telephone Company of Florida and Central Telephone Company of Florida's Objections to MCIMETRO's First Request for Production and Motion for Protective Order.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,



J. Jeffrey Wahlen

JJW/csu

cc: All Parties of Record

Enclosure

jjw\utd\950737.by0

DOCUMENT NUMBER-DATE

09697 SEP 29 95

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into temporary)	DOCKET NO. 950737-TP
local telephone number portability)	FILED: 9/29/95
solution to implement competition in)	
local exchange telephone markets)	
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**UNITED TELEPHONE COMPANY OF FLORIDA AND
CENTRAL TELEPHONE COMPANY OF FLORIDA'S
OBJECTIONS TO MCIMETRO'S FIRST REQUEST FOR
PRODUCTION AND MOTION FOR PROTECTIVE ORDER**

United Telephone Company of Florida ("Sprint/United") and Central Telephone Company of Florida ("Sprint/Centel") (collectively the "Companies"), pursuant to Rule 25-22.034, Florida Administrative Code, Florida Rule of Civil Procedure 1.350, and Order No. PSC-95-0896-PCO-TP, issued by the Florida Public Service Commission (the "Commission") in the above-styled docket on July 25, 1995, hereby submit the following Objections and Motion for Protective Order with respect to MCIMETRO's First Request for Production of Documents to United Telephone Company of Florida and Central Telephone Company of Florida.

General Objections

The Companies make the following objections to MCIMETRO's First Request for Production of Documents:

1. The Companies have interpreted the request to apply to the Companies' regulated intrastate operations in Florida and will limit their responses accordingly. To the extent that any request is intended to apply to matters other than the Florida intrastate operations subject to the jurisdiction of the Commission, the

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Companies object on the basis that such requests are irrelevant, overly broad, unduly burdensome and oppressive.

2. The Companies object to each and every request to the extent that such requests call for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege or other applicable privilege.

3. The Companies object to each and every request insofar as the requests are vague, ambiguous, overly broad, imprecise or utilize terms that are subject to multiple interpretations but are not properly defined or explained for purposes of the requests. Any responses provided by the Companies to the request will be provided subject to, and without waiver of, the foregoing objection.

4. The Companies object to each and every request insofar as the requests are not reasonably calculated to lead to the discovery of admissible evidence and are not relevant to the subject matter of this action. The Companies will attempt to note each instance where this objection applies.

5. The Companies object to producing documents, records and information to the extent that such information is already in the public record before the Florida Public Service Commission.

6. The Companies object to each and every request insofar as they are unduly burdensome, expensive, oppressive, or excessively time-consuming as written.

7. The Companies object to each and every 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 the request seeks proprietary confidential business information which is not subject to the "trade secrets" privilege, the Companies will make such information available to counsel for MCIMETRO pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

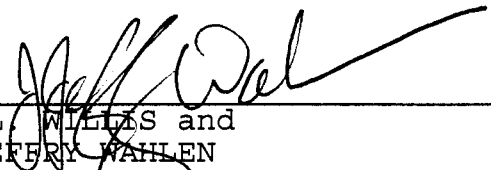
8. In the course of the Companies' business activities, they create many documents that are not subject to the Florida Public Service Commission's or Federal Communications Commission's retention of records requirements. These records are kept at numerous locations and are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every conceivable document will be provided in response to the request. Rather, the Companies responses will provide all the documents obtained by the Companies after a reasonable and diligent search conducted in connection with this discovery request. To the extent the discovery request purports to require more, the Companies object on the grounds that compliance would impose an undue burden or expense.

Motion for Protective Order

The Companies submit their objections to MCIMETRO's First Request for Production of Documents pursuant to the authority contained in Slatnik v. Leadership Housing Systems of Florida, Inc., 368 So.2d 79 (Fla. 3d DCA 1979). To the extent that a Motion

for Protective Order is required, the objections set forth herein are to be construed as a request for protective order.

DATED this 29th day of September, 1995.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 29th day of September, 1995, to the following:

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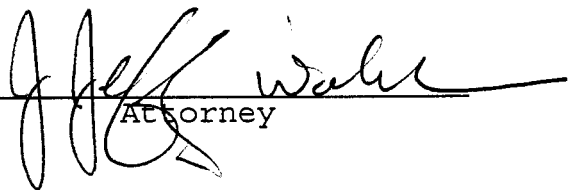
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