

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

FILED
JAN 4 1996

In re: Resolution of petition(s))	
to establish unbundled services,)	
network features, functions or)	Docket 950984-TP
capabilities, and local loops)	Filed: January 4, 1996
pursuant to Section 364.161,)	
Florida Statutes)	
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**WORLDCOM, INC. d/b/a LDDS WORLDCOM COMMUNICATIONS'
 RESPONSES AND 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 Responses and Objections to the First Request for Production of Documents from BellSouth Telecommunications, Inc. ("BellSouth").

SPECIFIC OBJECTIONS

1. Provide all documents identified or described in LDDS WorldCom's responses to Interrogatory Nos. 1 through 11 of BellSouth's First Set of Interrogatories to LDDS WorldCom.

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

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

2. **Provide all documents referred to or relied upon by LDDS WorldCom in responding to BellSouth's First Set of Interrogatories to LDDS WorldCom.**

Response: LDDS WorldCom objects to this production request on the basis that the request relates to operations in jurisdictions other than Florida and that it is 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. **Provide all documents that touch upon, describe or otherwise address LDDS WorldCom's position on any necessary discount on resold services which would be required in order to enable LDDS WorldCom to resell such services.**

Response: 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. Provide all documents that touch upon, describe or address whether LDDS WorldCom can resell a local exchange carrier's services without a discount on the retail services' prices charged by the local exchange companies.

Response: 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. Provide all documents which analyze, discuss, or otherwise address, the manner in which LDDS WorldCom plans to or may use a local exchange company's unbundled network elements or resold services in providing to service to LDDS WorldCom's customers.

Response: 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.

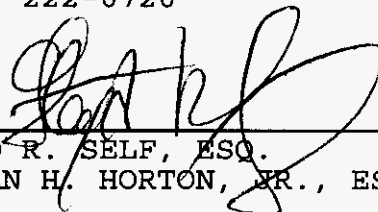
6. **Please provide all documents analyzing, commenting upon, or otherwise addressing the Stipulation and Agreement reached among several of the parties to this proceeding and so attached to the Motion for Stay filed in this proceeding and others on December 8, 1995.**

Response: 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 4th day of January, 1996.

Respectfully submitted,

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