

960833-TP

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by MCI for)
arbitration of certain terms)
and conditions of a proposed)
agreement with BellSouth)
Telecommunications, Inc.)
concerning interconnection and)
resale under the)
Telecommunications Act of 1996)

Docket No. 960846-TP

Served: September 27, 1996

OBJECTIONS OF MCI TELECOMMUNICATIONS CORPORATION TO BELLSOUTH TELECOMMUNICATIONS, INC.'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO MCI TELECOMMUNICATIONS CORPORATION

MCI Telecommunications Corporation ("MCI"), pursuant to Rules 25-22.034 and 25-22.035, Florida Administrative Code and Rules 1.350 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following Objections to BellSouth Telecommunications, Inc.'s ("BellSouth") First Request for Production of Documents to MCI.

The Objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the ten-day requirement set forth in Order No. PSC-96-0933-PCO-TP issued by the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced docket on July 17, 1996. Should additional grounds for objection be discovered as MCI prepares its Responses to the above-referenced set of requests, MCI reserves the right to supplement, revise, or modify its objections at the time that it serves its Responses on BellSouth. Moreover, should MCI determine that a Protective Order is necessary with respect to any of the material requested by BellSouth, MCI reserves the right to file a motion with the Commission seeking such an order at the time that it serves its Responses on BellSouth.

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG 2 _____
- LIN 5 _____
- OPC _____
- ROH _____
- SEC 1 _____
- WAS _____
- OTH _____

Request No. 1. Produce all documents identified or described in MCI's responses to BellSouth's First Set of Interrogatories to MCI.
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5 MCI objection: MCI objects to this request on the same grounds

set forth in MCI's Objections to BellSouth Telecommunications, Inc.'s First Set of Interrogatories which is being served on BellSouth contemporaneously with these objections. Such objections are incorporated herein by specific reference thereto. MCI will respond to this request to the same extent outlined in its objections to said interrogatories.

Request No. 2. Produce all documents referred to or relied upon by MCI in responding to BellSouth's First Set of Interrogatories to MCI.

MCI objection: MCI objects to this request on the same grounds set forth in MCI's Objections to BellSouth Telecommunications, Inc.'s First Set of Interrogatories which is being served on BellSouth contemporaneously with these objections. Such objections are incorporated herein by specific reference thereto. MCI will respond to this request to the same extent outlined in its objections to said interrogatories.

Request No. 3. Produce all documents that touch upon, describe, or otherwise address the interconnection rates, terms or conditions that MCI believes should apply to interconnection between incumbent local exchange companies ("ILECs") and alternative local exchange companies ("ALECs").

MCI objection: MCI objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and oppressive.

Request No. 4. Produce all documents that touch upon, describe, or otherwise address the wholesale rates, terms or conditions

that MCI believes should apply to resale of local exchange services by ILECs to ALECs.

MCI objection: MCI objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and oppressive.

Request No. 5. Produce all documents that touch upon, describe, or otherwise address the rates, terms or conditions for unbundled network elements that MCI believes should apply to unbundling network elements between ILECs and ALECs.

MCI objection: MCI objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, and oppressive.

Request No. 6. Produce all documents that touch upon, describe, or otherwise address any services or products that MCI prices "at TSLRIC".

MCI objection: MCI objects to this request on the grounds that it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the request is overly broad, unduly burdensome, oppressive, and seeks information that is subject to the trade secrets privilege and is beyond the scope of this proceeding.

Request No. 7. Produce all documents that touch upon, describe, or otherwise address any reciprocal compensation arrangements between MCI and any other telecommunications company for network interconnection in any manner.

MCI objection: MCI objects to this request on the grounds that it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the request is overly broad, unduly burdensome, oppressive, and seeks information that is subject to the trade

secrets privilege and is beyond the scope of this proceeding.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by hand delivery this 27th day of September, 1996.

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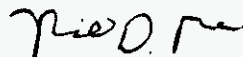
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