

ORIGINAL
FILE COPY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by MCI)	
Telecommunications Corporation)	
and MCImetro Access Transmission)	Docket No. 960980-TP
Services, Inc. for arbitration)	
of certain terms and conditions)	
of a proposed agreement with GTE)	
Florida Incorporated concerning)	
interconnection and resale under)	Filed: September 30, 1996
the Telecommunications Act)	
of 1996)	
)	

OBJECTIONS OF MCI
TO GTE FLORIDA INCORPORATED'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

MCI Telecommunications Corporation and MCImetro Access Transmission Services, Inc. ("MCI"), 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 submit the following Objections to GTE Florida Incorporated's ("GTE") 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 the procedural order previously issued in the above-referenced docket. Should additional grounds for objection be discovered as MCI prepares its Responses to the above-referenced request for production of documents, MCI reserves the right to supplement, revise, or modify its objections at the time that it serves its Responses on GTE. Moreover, should MCI determine that a Protective Order is necessary with respect to any of the material requested by GTE, MCI reserves the right to file a motion with the Commission seeking such an order at the time it

DOCUMENT NUMBER-DATE

10457 SEP 30 96

FPSC-RECORDS/REPORTING

serves its Response on GTE.

Objections to Request for Production Nos. 1 - 3, 6 - 20, 24 - 39, 41, 43 - 45, 49 and 50:

MCI objects to these Requests for Production of Documents on the grounds that the documents requested are irrelevant, overly broad, unduly burdensome, oppressive, and not reasonably calculated to lead to the discovery of admissible evidence.

Objections to Requests for Production Nos. 4 and 5:

MCI objects to these Requests for Production of Documents on the grounds that the documents requested are irrelevant, overly broad, unduly burdensome, oppressive, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, they seek documents which are subject to the attorney/client, work product, and trade secrets privileges. The scope of this proceeding is to determine the obligations of GTE pursuant to the Telecommunications Act of 1996. MCI's plans to enter the local exchange market and any information related thereto are not within the scope of this proceeding.

Objections to Requests for Production Nos. 21 - 23, 40, 46, and 47:

MCI objects to these Requests for Production of Documents on the grounds that the documents requested are irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the requests are overly broad, unduly burdensome, oppressive, and seek information that is subject to the trade secrets privilege and that is beyond the scope of this proceeding.

FILED this 30th day of September, 1996.

HOPPING GREEN SAMS & SMITH, P.A.

By:



Richard D. Melson
P.O. Box 6526
Tallahassee, Florida 32314
(904) 425-2313

and

MARTHA MCMILLIN
MCI Telecommunications Corp.
Suite 700
780 Johnson Ferry Road
Atlanta, Georgia 30342

ATTORNEYS FOR MCI
TELECOMMUNICATIONS CORPORATION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by hand delivery this 30th day of September, 1996.

Donna Canzano
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Kimberly Caswell
c/o Richard Fletcher
GTE Florida, Inc.
106 E. College Avenue, #1440
Tallahassee, FL 32301-7704

Tracy Hatch
AT&T
101 N. Monroe St., Suite 700
Tallahassee, FL 32301

and by UPS Delivery to:

Kimberly Caswell
GTE Florida, Inc.
One Tampa City Center
Tampa, FL 33601

Robin D. Dunson
AT&T
Room 4038
1200 Peachtree St. NE
Atlanta, GA 30309



Attorney