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November 15, 1996

Ms. Blanca Bayo, Director  
Division of Records and Reporting  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

**BY HAND DELIVERY**

Re: Docket No. 960786-TL

Dear Ms. Bayo:

Enclosed are an original and fifteen copies of WorldCom, Inc. d/b/a LDDS WorldCom Communications' Objections to BellSouth Telecommunications, Inc.'s First Set of Interrogatories and WorldCom, Inc. d/b/a LDDS WorldCom Communications' Objections to BellSouth Telecommunications, Inc.'s First Request for Production of Documents in the above-referenced docket. Also enclosed is a diskette with the Objections to BellSouth's First Request for Production of Documents on it in WordPerfect 6.0/6.1 format.

ACK  Please indicate receipt of this document by stamping the enclosed extra copy of this letter.

AFA \_\_\_\_\_

APP \_\_\_\_\_ Thank you for your assistance in this matter.

CAF \_\_\_\_\_

CMU Career

CTR \_\_\_\_\_

AG \_\_\_\_\_

EG 2

LIN 5

GGJ/amb

OPC \_\_\_\_\_ Enclosures

RCH \_\_\_\_\_ cc: Mr. Brian Sulmonetti

SEC 1 Parties of Record

WAS \_\_\_\_\_

OTH \_\_\_\_\_

Sincerely,



Gwen G. Jacobs

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE  
12184 NOV 15 1996  
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth	)	
Telecommunications, Inc.'s entry into	)	
InterLATA services pursuant to Section	)	Docket No. 960786-TL
271 of the Federal Telecommunications	)	Filed: November 15, 1996
Act of 1996.	)	
<hr/>		
	)	

**WORLDCOM, INC. D/B/A LDDS WORLDCOM COMMUNICATIONS'  
OBJECTIONS TO BELL SOUTH TELECOMMUNICATIONS INC.'S  
FIRST SET OF INTERROGATORIES**

COMES NOW, WorldCom, Inc. d/b/a LDDS WorldCom Communications ("WorldCom"), 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 BellSouth Telecommunications Inc.'s ("BellSouth") First Set of Interrogatories to WorldCom.

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-96-0945-PCO-TL issued by the Florida Public Service Commission ("hereinafter the "Commission") in the above-referenced docket on July 19, 1996. Should additional grounds for objection be discovered as WorldCom prepares its Answers to the above-referenced set of interrogatories, WorldCom reserves the right to supplement, revise, or modify its objections at the time that it serves its Answers on BellSouth.

**GENERAL OBJECTIONS**

WorldCom makes the following General Objections to BellSouth's First Set of Interrogatories which will be incorporated by reference into WorldCom's specific responses when its Answers are served on BellSouth.

DOCUMENT NUMBER-DATE  
12184 NOV 15 96  
FPSC-RECORDS/REPORTING

1. WorldCom objects to the interrogatories to the extent that such interrogatories seek to impose an obligation on WorldCom 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. WorldCom has interpreted BellSouth's interrogatories to apply to WorldCom's regulated intrastate operations in Florida and will limit its Answers accordingly. To the extent that any interrogatory is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the commission, WorldCom objects to such interrogatory as irrelevant, overly broad, unduly burdensome, and oppressive.

3. WorldCom objects to each and every interrogatory and instruction to the extent that such interrogatory 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. WorldCom objects to each and every interrogatory 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 interrogatories. Any Answers provided by WorldCom in response to BellSouth's interrogatories will be provided subject to, and without waiver, of the foregoing objection.

5. WorldCom objects to each and every interrogatory 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. WorldCom will attempt to note each instance where this objection applies.

6. WorldCom objects to BellSouth's discovery requests, instructions and definitions, insofar as they seek to impose obligations on WorldCom which exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

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

8. WorldCom objects to each and every interrogatory, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written to prepare.

9. BellSouth objects to each and every interrogatory to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that BellSouth's interrogatories request proprietary confidential business information which is not subject to the "trade secrets" privilege, WorldCom will make such information available to counsel for BellSouth pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

#### **OBJECTIONS TO SPECIFIC INTERROGATORIES**

Subject to and without waiver of, the foregoing general objections, WorldCom enters the following specific objections with respect to BellSouth's interrogatories:


10. Pursuant to the General Objections stated above, WorldCom objects to Interrogatories 1, and 4 on the grounds that they seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence related to the issue of whether BellSouth has met or will be able to meet the requirements of Section 271 of the Telecommunications Act of 1996.

11. Pursuant to the General Objections stated above, WorldCom objects to Interrogatory 2 and on the grounds that it seeks information that is not relevant to the issues in this docket. Moreover, the information sought has nothing to do with §271 of the Telecommunications Act of 1996 and BellSouth's entry into the interLATA market.

12. Pursuant to the General Objections stated above, WorldCom objects to Interrogatories 5, 6 and 7 on the grounds that they seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence related to the issue of whether BellSouth has met or will be able to meet the requirements of Section 271 of the Telecommunications Act of 1996. Moreover, WorldCom has not sought interconnection, therefore the requested information regarding its network facilities is irrelevant.

13. Pursuant to the General Objections stated above, WorldCom objects to Interrogatory 8 on the grounds that it is overly broad, not sufficiently specific to answer and therefore, unduly burdensome and oppressive.

Respectfully submitted,  
MESSER, CAPARELLO, MADSEN,  
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Attorneys for WorldCom, Inc. d/b/a LDDS WorldCom  
Communications

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of WorldCom, Inc. d/b/a LDDS WorldCom Communications' Objections to BellSouth Telecommunications, Inc.'s First Set of Interrogatories in Docket No. 960786-TL have been served upon the following parties by Hand Delivery (\*) and/or Overnight Delivery (\*\*) this 15th day of November, 1996:

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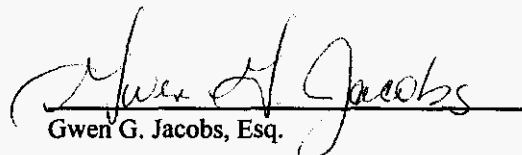
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