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Ms. Blanca S. Bayó
Director, Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket Nos. 960786-TL

Dear Ms. Bayó:

On behalf of MCI Telecommunications Corporation (MCI) enclosed for filing in the above docket are the original and 15 copies of MCI's Objections to BellSouth's First Set of Interrogatories and MCI's Objections to BellSouth's First Request for Production of Documents.

By copy of this letter these documents have been provided to the parties on the attached service list.

Very truly yours,

Richard D. Melson

ACK _____
AFA _____
APP _____ RDM/cc
CAF _____ Enclosures
CMU _____ cc: Parties of Record
CTR _____
EFO _____
JAN _____
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SEC _____ 79858.1
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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of)
BellSouth Telecommunications,)
Inc. entry into InterLATA)
Services pursuant to Section)
271 of the Federal)
Telecommunications Act of)
1996)
_____)

Docket No. 960786-TL
Filed: November 18, 1996

MCI TELECOMMUNICATIONS CORPORATION'S OBJECTIONS TO
BELLSOUTH'S FIRST SET OF INTERROGATORIES

MCI Telecommunications Corporation ("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 submits the following Objections to BellSouth Telecommunications, Inc.'s ("BellSouth's") First Set of Interrogatories 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-96-0945-PCO-TL. Should additional grounds for objection be discovered as MCI prepares its Answers to these interrogatories, MCI reserves the right to supplement, revise or modify its objections at the time that it serves its Answers 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 it serves its Answers on BellSouth.

GENERAL OBJECTIONS

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

1. MCI objects to the definition of "MCI Telecommunications Corporation" to the extent such definition seeks to impose an obligation on MCI Telecommunications Corporation to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such definition is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. MCI has interpreted BellSouth's interrogatories to apply to MCI's regulated intrastate operations in Florida and will limit its answers accordingly. To the extent that any request is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission, Sprint objects to such request as irrelevant, overly broad, unduly burdensome and oppressive.

3. MCI 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. MCI objects to each and every interrogatory insofar as the interrogatory 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 MCI in response to BellSouth's interrogatories will be provided subject to, and without waiver of, the foregoing objection.

5. MCI objects to each and every interrogatory insofar as the interrogatory is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. MCI will attempt to note each instance where this objection applies.

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

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

8. MCI objects to each and every interrogatory, general instruction or definition insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. MCI 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, MCI 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, MCI enters the following specific objections with respect to BellSouth interrogatories.

Interrogatory 1. For 1994, 1996 and 1997, identify the number of business, residential and total number of subscribers in Florida that subscribed or are projected to subscribe to MCI interexchange service.

MCI Objection: MCI objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, oppressive, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, it seeks information which is subject to the trade secrets privilege. The scope of this proceeding is to determine whether BellSouth has met the requirements of Section 271 of the Telecommunications Act of 1996. The information requested is not within the scope of this proceeding.

Interrogatory 4. Separately for 1995 and to-date in 1996, identify all interexchange resellers that do business in Florida and identify the underlying carrier for any service the reseller provides or provided in Florida.

MCI Objection: MCI objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, oppressive, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. The scope of this proceeding is to determine whether BellSouth has met the requirements of Section 271 of the Telecommunications Act of 1996. The information requested is beyond the scope of this proceeding. In addition, the identify of resellers who do business in Florida is equally available to BellSouth from the records of the Florida Public Service Commission.

Interrogatory 5. Describe in detail MCI's plans to use its own network, whether wireline or wireless, to provide local telephone service in Florida. If this network is in place today, describe

the components of the network. If the network is not place, please describe the actions MCI has taken to implement its local telephone network; and state where and when MCI expects the local network to be in place and ready to provide service and what facilities will be used.

MCI Objection: MCI objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, oppressive, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, it seeks information which is subject to the trade secrets privilege. The scope of this proceeding is to determine whether BellSouth has met the requirements of Section 271 of the Telecommunications Act of 1996. The information requested is not within the scope of this proceeding.

Interrogatory 6. If MCI provides telephone exchange service to Florida consumers, does MCI plan to use its own billing, support and ordering systems to provide local service? Are these billing, support and ordering systems in place today? What actions to implement MCI's local billing, support and ordering systems have already been completed? What actions must still be undertaken to implement MCI's local billing, ordering and support systems?

MCI Objection: MCI objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, oppressive, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, it seeks information which is subject to the trade secrets privilege. The scope of this proceeding is to determine whether BellSouth has met the requirements of Section 271 of the Telecommunications Act of 1996. The information requested is not within the scope of this proceeding.

Interrogatory 7. If MCI provides telephone exchange service to Florida consumers, does MCI plan to use exchange facilities of any other carrier(s)? If so, identify the carrier(s), the facilities, whether network or support, that MCI plans to use, and the locations and capabilities of those facilities.

MCI Objection: MCI objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, oppressive, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, it seeks information which is subject to the trade secrets privilege. The scope of this proceeding is to determine whether BellSouth has met the requirements of Section 271 of the Telecommunications Act of 1996. The information requested is not within the scope of this

proceeding.

Interrogatory 8. Identify each provider of exchange access services other than BellSouth that MCI utilizes for exchange access service in Florida, and, for each such provider describe the geographic area(s) where it provides service, the type, capacity and route miles of transmission facilities in each area and the amount paid by MCI to the provider in 1995.

MCI Objection: MCI objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, oppressive, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, it seeks information which is subject to the trade secrets privilege. The scope of this proceeding is to determine whether BellSouth has met the requirements of Section 271 of the Telecommunications Act of 1996. The information requested is not within the scope of this proceeding.

RESPECTFULLY SUBMITTED this 18th day of November, 1996.

HOPPING GREEN SAMS & SMITH, P.A.

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ATTORNEYS FOR MCI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was transmitted by U.S. Mail, by Hand Delivery (*), or by UPS Overnight (**) to the following parties this 18th day of November, 1996.

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