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November 22, 1996

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

Re: Docket 961230-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of MCI Telecommunications Corporation and MCImetro Access Transmission Services, Inc. (collectively, "MCI") are the original and 15 copies of MCI's Objections to Sprint's Request for Production of Documents.

By copy of this letter, this document has been furnished to the parties on the attached service list.

Very truly yours,

Richard D. Melson

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

RDM/cc
Enclosures
cc: Parties of Record

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
12573 NOV 22 96
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by MCI)
Telecommunications Corporation for)
arbitration with United Telephone)
Company of Florida and Central)
Telephone Company of Florida)
concerning interconnection rates)
terms and conditions pursuant to)
the Federal Telecommunications Act)
of 1996)
_____)

Docket No. 961230-TP

Filed: November 22, 1996

MCI'S OBJECTIONS TO
SPRINT'S 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 1.350 and 1.280(b), Florida Rules of Civil Procedure, hereby submit the following Objections to the Request for Production of Documents to MCI served by United Telephone Company of Florida and Central Telephone Company of Florida ("Sprint") on November 12, 1996.

The Objections 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-96-1235-PCO-TP. Should additional grounds for objection be discovered as MCI prepares its Responses to these requests, MCI reserves the right to supplement, revise, or modify its objections at the time that it serves its Responses on Sprint. Moreover, should MCI determine that a Protective Order is necessary with respect to any of the material requested by Sprint, MCI reserves the right to file a

motion with the Commission seeking such an order at the time that it serves its Responses on Sprint.

GENERAL OBJECTIONS

MCI makes the following general objections to Sprint's Request for Production of Documents which will be incorporated by reference into MCI's specific responses when its Responses are served on Sprint.

1. MCI objects to each and every request and instruction to the extent that such request or instruction calls for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

2. MCI objects to each and every request 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 requests. Any responses provided by MCI in response to Sprint's requests will be provided subject to, and without waiver of, the foregoing objection.

3. MCI objects to each and every request 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. MCI will attempt to note each instance where this objection applies.

4. MCI objects to Sprint'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.

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

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

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

OBJECTIONS TO SPECIFIC REQUESTS

Subject to, and without waiver of, the foregoing general objections, MCI enters the following specific objections with respect to Sprint's requests.

3. All documents showing MCI's network development plans in Florida, generally, or in the certificated territory of Sprint-United and Sprint-Centel in Florida, specifically.

MCI Response: MCI objects to this request for production 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 details of MCI's network development plans in Florida are not relevant to any of the issues to be arbitrated in this proceeding.

RESPECTFULLY SUBMITTED this 22nd day of November, 1996.

HOPPING GREEN SAMS & SMITH, P.A.

By: Richard D. Melson
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and

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ATTORNEYS FOR MCI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by hand delivery or by UPS Overnight Delivery (*) this 22nd day of November, 1996.

Jerry M. Johns (*)
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