

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth)
Telecommunications, Inc.'s entry into)
InterLATA services pursuant to Section)
271 of the Federal Telecommunications)
Act of 1996.)
_____)

Docket No. 960786-TL
Filed: November 26, 1996

WORLDCOM, INC. D/B/A LDDS WORLDCOM COMMUNICATIONS'
RESPONSE AND 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 Responses and Objections to BellSouth Telecommunications Inc.'s ("BellSouth") First Set of Interrogatories to WorldCom.

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.

1. WorldCom objects to the interrogatories to the extent that such interrogatories seek

ACK _____
AFA _____
APP _____
CAF _____
CMU _____
CTR _____
EAG _____
LEG _____
LIN _____
OPB _____
RCH _____
SEC _____
WAS _____
OTH _____

_____ 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 limits its Answers accordingly. To the extent that any interrogatory is intended to apply to matters other than Florida intrastate operations subject to

DOCUMENT NUMBER-DATE
12660 NOV 25 88
FPSC-RECORDS/REPORTING

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.

SPECIFIC OBJECTIONS

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

1. **For 1995, 1996, and 1997, identify the number of business, residential and total number of subscribers in Florida that subscribed or are projected to subscribe to LDDS WorldCom interexchange service.**

Response: Pursuant to the General Objections stated above, WorldCom objects to Interrogatory 1 on the grounds it seeks 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. Notwithstanding the foregoing objections and without waiving any objection, WorldCom would answer this interrogatory by stating that if BellSouth Telecommunications, Inc. really needs this information, the Florida PSC has a listing of all certified carriers in the state. WorldCom has information on the resellers on its network, but objects to providing this information on the basis of the foregoing objections.

2. **Describe in detail any possible harm to the public interest that may arise from BellSouth's being allowed to engage in manufacturing activities as described in Section 274 of the Telecommunications Act of 1996.**

Response: 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.

3. **Describe in detail any possible harm to the public interest that may arise from BellSouth's being allowed to provide interLATA service to consumers in Florida.**

Response: While no statement of position has yet been taken by WorldCom, we believe that premature entry of a Bell Company into the long distance market will not be in the public interest. Entry should be conditioned on effective local competition being in place prior to the granting of any entry application by the FCC.

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.**

Response: Pursuant to the General Objections stated above, WorldCom objects to Interrogatory 4 on the grounds it seeks 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.

5. **Describe in detail LDDS WorldCom'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 in place, please describe the actions LDDS WorldCom has taken to implement its local telephone network; and state where and when LDDS WorldCom expects the local network to be in place and ready to provide service and what facilities will be used.**

Response: Pursuant to the General Objections stated above, WorldCom objects to Interrogatory 5 on the grounds it seeks 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. Notwithstanding the foregoing objections and without waiving any objection, WorldCom would answer this interrogatory by stating that WorldCom does not have any plans to utilize its existing network to provide local telephone service in Florida. However, WorldCom has entered into a plan of merger with Metropolitan Fiber Systems, which is engaged or planning to become engaged in the provision of local telephone service in Florida through its own and resold facilities.

6. **If LDDS WorldCom provides telephone exchange service to Florida consumers, does LDDS WorldCom 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 LDDS WorldCom's local billing, support and ordering systems have already been completed? What actions must still be undertaken to implement LDDS WorldCom's local billing, ordering and support systems?

Response: See WorldCom's response to Interrogatory 5.

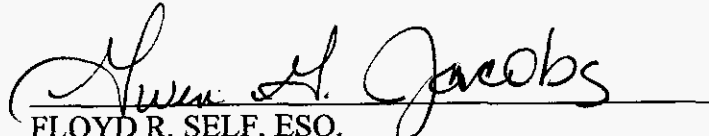
7. If LDDS WorldCom provides telephone exchange service to Florida consumers, does LDDS WorldCom plan to use exchange facilities of any other carrier(s)? If so, identify the carrier(s), the facilities, whether network or support, that LDDS WorldCom plans to use, and the locations and capabilities of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

Response: See WorldCom's response to Interrogatory 5.

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

Response: 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. Notwithstanding the foregoing objections and without waiving any objection, WorldCom would answer this interrogatory by stating that WorldCom obtains exchange access from most incumbent LECs in Florida as well as from some ALECs/AAVs.

Respectfully submitted,
MESSER, CAPARELLO, MADSEN,
GOLDMAN & METZ, P.A.
P. O. Box 1876
Tallahassee, Florida 32302
(904) 222-0720


FLOYD R. SELF, ESQ.
GWEN G. JACOBS, ESQ.

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' Responses and 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 26th day of November, 1996:

Monica Barone, Esq.*
Division of Legal Services, Room 370
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Ms. Nancy White*
c/o Ms. Nancy Sims
BellSouth Telecommunications, Inc.
150 S. Monroe Street, Suite 400
Tallahassee, FL 32301

Joseph A. McGlothlin, Esq.*
Vicki Gordon Kaufman, Esq.
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas, P.A.
117 South Gadsden St.
Tallahassee, FL 32301

Patrick K. Wiggins, Esq.*
Wiggins & Villacorta, P. A.
501 E. Tennessee St.
Tallahassee, Florida 32302

Patricia Kurlin, Esq.**
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33169-1309

Richard D. Melson*
Hopping Green Sams & Smith
123 S. Calhoun St.
Tallahassee, FL 32301

Martha McMillin**
MCI Telecommunications
780 Johnson Ferry Road, Suite 700
Atlanta, GA 30342

Tracy Hatch, Esq*
AT&T
101 N. Monroe St., Suite 700
Tallahassee, Florida 32301

Robin D. Dunson, Esq.**
1200 Peachtree St., NE
Promenade I, Room 4038
Atlanta, Georgia 30309

Mr. Andrew O. Isar**
Director- Industry Relations
Telecommunications Resellers
Association
4312 92nd Avenue, NW
Gig Harbor, WA 98335

Mr. Jeffrey J. Walker**
Regulatory Counsel
Preferred Carrier Services, Inc.
1425 Greenway Drive, Suite 210
Irving, TX 75038

Benjamin Fincher, Esq.**
Sprint Communications Co., L.P.
3100 Cumberland Circle
Atlanta, GA 30339

C. Everett Boyd, Jr.*
Ervin, Varn, Jacobs, Odom & Ervin
305 S. Gadsden St.
Tallahassee, FL 32301

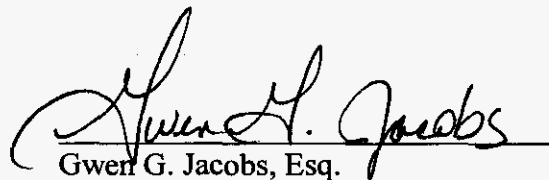
Timothy Devine**
MFS Communication Company, Inc.
6 Concourse Parkway, Suite 2100
Atlanta, GA 30328

Richard M. Rindler**
Swidler & Berlin, Chartered
3000 K Street, N.W., Suite 300
Washington, DC 20007

Sue E. Weiske, Esq.**
Time Warner Communications
3rd Floor North
160 Inverness Drive West
Englewood, CO 80112

Peter M. Dunbar, Esq.*
Robert S. Cohen, Esq.
Pennington, Culpepper, Moore, Wilkinson,
Dunbar & Dunlap, P.A.
2nd Floor
215 S. Monroe St.
Tallahassee, FL 32301

Ms. Jill Butler*
Florida Regulatory Director
Time Warner Communications
2773 Red Maple Ridge
Tallahassee, FL 32301


Gwen G. Jacobs, Esq.