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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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| 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 26, 1996 |
| Act of 1996. |) | |
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**WORLDCOM, INC. D/B/A LDDS WORLDCOM COMMUNICATIONS' RESPONSE
AND OBJECTIONS TO BELL SOUTH TELECOMMUNICATIONS INC.'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

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 Request for Production of Documents.

GENERAL OBJECTIONS

WorldCom makes the following General Objections to BellSouth's First Request for Production of Documents which will be incorporated by reference into WorldCom's specific responses.

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|--------------------|----|--|
| ACK _____ | 1. | WorldCom objects to the requests to the extent that such requests seek to impose an |
| AFA _____ | | obligation on WorldCom to respond on behalf of subsidiaries, affiliates, or other persons that are not |
| APP _____ | | parties to this case on the grounds that such requests are overly broad, unduly burdensome, |
| CMU _____ | | oppressive, and not permitted by applicable discovery rules. |
| CTR _____ | | |
| EAG _____ | 2. | WorldCom has interpreted BellSouth's requests to apply to WorldCom's regulated |
| LEG _____ | | intrastate operations in Florida and will limits its Answers accordingly. To the extent that any |
| LIN <u>5</u> _____ | | request is intended to apply to matters other than Florida intrastate operations subject to the |
| OPC _____ | | |
| RCH _____ | | |
| SEQ <u>1</u> _____ | | |
| WAS _____ | | |
| OTH _____ | | |

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jurisdiction of the commission, WorldCom objects to such request as irrelevant, overly broad, unduly burdensome, and oppressive.

3. WorldCom 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.

4. WorldCom 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 Answers provided by WorldCom in response to BellSouth's request will be provided subject to, and without waiver of, the foregoing objection.

5. WorldCom 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. 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 request, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. BellSouth 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 BellSouth requests 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.

RESPONSES AND 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 requests:

1. **Provide documents such as route maps sufficient to show the type and location of LDDS WorldCom network facilities in Florida.**

Response: Pursuant to the General Objections stated above, WorldCom objects to BellSouth's Request for Production of Documents Item 1 on the grounds that 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 with BellSouth, thus information regarding WorldCom's network facilities is irrelevant. Furthermore, the information requested is subject to the trade secret privilege.

2. **Provide all documents that discuss or analyze consumer preferences regarding telephone exchange service, interLATA telephone service and for a single provider of both local and interLATA service.**

Response: Pursuant to the General Objections stated above, WorldCom objects to Item 2 on the grounds that it is overly broad, unduly burdensome, oppressive, irrelevant, and not 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, it seeks information which is subject to the attorney/client, work product and trade secret privileges. Notwithstanding the foregoing objection and without waiving any objection, WorldCom would respond to this request by stating WorldCom has no documents responsive to this request.

3. **Provide all documents that compare LDDS WorldCom or LDDS WorldCom brands used in providing interLATA or wireless services in Florida with BellSouth or BellSouth brands or other brands used by providers of telecommunications services in Florida.**

Response: Pursuant to the General Objections stated above, WorldCom objects to Item 3 on the grounds that it is neither relevant nor reasonably calculated to lead to 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, the request is unduly burdensome, oppressive and seeks information that

is subject to the attorney/client, work product and trade secret privileges and is beyond the scope of this proceeding. Notwithstanding the foregoing objections and without waiving any objection, WorldCom would answer this request by stating that WorldCom has no documents responsive to this request.

4. **Provide all documents that discuss or analyze projections regarding BellSouth's potential interLATA revenues, number and type of subscribers or market share in Florida should it enter the interLATA business.**

Response: Pursuant to the General Objections stated above, WorldCom objects to Item 4, on the grounds that the information sought 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 the request is unduly burdensome, oppressive and seeks information that is subject to the attorney/client, work product and trade secrets privileges. Notwithstanding the foregoing objections and without waiving any objection, WorldCom would answer this request by stating that WorldCom has no documents responsive to this request.

5. **Provide all documents that discuss or analyze BellSouth's possible business strategies, tactics and actions for entering and competing in the interLATA business in Florida.**

Response: Pursuant to the General Objections stated above, WorldCom objects to Item 5, on the grounds that the information sought 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 the request is unduly burdensome, oppressive and seeks information that is subject to the attorney/client, work product and trade secret privileges. Notwithstanding the foregoing objections and without waiving any objection, WorldCom would answer this request by stating that WorldCom has no documents responsive to this request.

6. **Provide all documents that discuss or analyze actual or possible business responses that LDDS WorldCom or others may use in Florida relating to BellSouth's potential entry into the interLATA business.**

Response: Pursuant to the General Objections stated above, WorldCom objects to Item 6, on the grounds that the information sought 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 the request is unduly burdensome, oppressive and seeks information that is subject to the attorney/client, work product and trade secret privileges. Notwithstanding the foregoing objections and without waiving any objection, WorldCom would answer this request by stating that WorldCom has no documents responsive to this request.

7. **Provide all documents that discuss or analyze the competitive environment for providing interLATA services in Florida, including all documents that discuss**

or analyze competitive strategies, market shares and likely outcomes of competition for interLATA subscribers in Florida.

Response: Pursuant to the General Objections stated above, WorldCom objects to Item 7 on the grounds that the information sought 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 the request is unduly burdensome, oppressive and seeks information that is subject to the attorney/client, work product and trade secret privileges. Notwithstanding the foregoing objections and without waiving any objection, WorldCom would answer this request by stating that WorldCom has no documents responsive to this request.

8. Provide all documents that discuss or analyze pricing or marketing programs undertaken by LDDS WorldCom's competitors for interLATA customers in Florida and LDDS WorldCom's actual or possible responses.

Response: Pursuant to the General Objections stated above, WorldCom objects to Item 8 on the grounds that the information sought 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 the request is unduly burdensome, oppressive and seeks information that is subject to the attorney/client, work product and trade secret privileges. Notwithstanding the foregoing and without waiving any

objection, WorldCom would answer this request by stating that WorldCom has no documents responsive to this request.

9. **Provide all documents that discuss or analyze LDDS WorldCom's decision to bid for, or not to bid for, and to become a supplier, or not, of interLATA services to BellSouth.**

Response: Pursuant to the General Objections stated above, WorldCom objects to Item 9 on the grounds that the information sought 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 the request is unduly burdensome, oppressive and seeks information that is subject to the attorney/client, work product and trade secret privileges. Notwithstanding the foregoing objection and without waiving any objection, WorldCom would answer this request by stating that WorldCom has no documents responsive to this request.

10. **Provide all documents that discuss or analyze whether BellSouth's entry into the interLATA business may affect its dealings with LDDS World Com or any other provider, or potential provider, of telephone exchange or exchange access service in Florida.**

Response: Pursuant to the General Objections stated above, WorldCom objects to Item 10 on the grounds that the information sought is overly broad, unduly burdensome, and oppressive. Moreover, the information sought is neither relevant nor reasonably

calculated to lead to the discovery of admissible evidence related to the issue 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 request by stating that WorldCom has no documents responsive to this request.

11. **Provide all documents that discuss or analyze whether BellSouth's entry into the interLATA business may affect competition in the provision of telephone exchange or exchange access service in Florida.**

Response: Pursuant to the General Objections stated above, WorldCom objects to Item 11, on the grounds that the information sought 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 the request is unduly burdensome, oppressive and seeks information that is subject to the attorney/client, work product and trade secret privileges. Notwithstanding the foregoing objections and without waiving any objection, WorldCom would respond to this request by stating that WorldCom has no documents responsive to this request.

12. **Provide all documents that discuss or analyze LDDS WorldCom's, or any other firm's, projected revenues, subscribers, market share or contribution from providing telephone exchange service in Florida.**

Response: Pursuant to the General Objections stated above, WorldCom objects to Item 12 on the grounds that the request 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, the information sought is subject to the trade secret privilege and beyond the scope of this proceeding. Notwithstanding the foregoing objections and without waiving any objection, WorldCom would answer this request by stating that WorldCom has no documents responsive to this request.

13. **Provide all documents that discuss or analyze the competitive environment for providing telephone exchange service, whether wireline or wireless, in Florida including all documents that discuss or analyze competitive strategies, market shares and likely outcomes of competition for telephone exchange customers in Florida.**

Response: Pursuant to the General Objections stated above, WorldCom objects to Item 13 on the grounds that the information sought 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, the request is overly broad, unduly burdensome, oppressive and seeks information that is subject to the attorney/client, work product, and trade secret privileges. Notwithstanding the foregoing objections

and without waiving any objection, WorldCom would answer this request by stating that WorldCom has no documents responsive to this request. If BellSouth Telecommunications, Inc. wants documents from other carriers, it can request such material from those carriers.

14. **Provide all documents that discuss or analyze the competitive environment for providing exchange access service, whether wireline or wireless, in Florida including all documents that discuss or analyze competitive strategies, market shares and likely outcomes of competition for exchange access customers in Florida.**

Response: Pursuant to the General Objections stated above, WorldCom objects to Item 14 on the grounds that the information sought 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, the request is overly broad, unduly burdensome, oppressive and seeks information that is subject to the attorney/client, work product, and trade secret privileges. Notwithstanding the foregoing objections and without waiving any objection, WorldCom would answer this request by stating that WorldCom has no documents responsive to this request.

15. **Provide all documents that discuss or analyze the competitive strengths and weaknesses of BellSouth as a provider of telephone exchange and exchange access service in Florida, including all documents that discuss or analyze**

BellSouth's telephone exchange and exchange access service market share, capabilities, subscribers or revenues.

Response: Pursuant to the General Objections stated above, WorldCom objects to Item 15 on the grounds that the information sought 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, the request is overly broad, unduly burdensome, oppressive and seeks information that is subject to the attorney/client, work product, and trade secret privileges. Notwithstanding the foregoing objections and without waiving any objection, WorldCom would answer this request by stating that WorldCom has no documents responsive to this request.

16. **Provide all documents constituting sales or advertising materials or proposals from non-BellSouth providers, or potential providers, of telephone exchange or exchange access services to Florida consumers regarding providing such services to LDDS WorldCom.**

Response: Pursuant to the General Objections stated above, WorldCom objects to Item 16 on the grounds that 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 the request seeks information that is subject to the trade secret privilege. Notwithstanding the foregoing objections and

without waiving any objection, WorldCom would answer this request by stating that WorldCom has no documents of its own that are responsive to this request. If BellSouth Telecommunications, Inc. wants documents from other carriers, it can request such material from those carriers.

17. **Provide all documents that discuss or analyze possible acquisitions of local telephone service assets or equipment to be used in Florida.**

Response: Pursuant to the General Objections stated above, WorldCom objects to Item 17 on the ground that 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 and therefore any information regarding its network facilities is irrelevant. Notwithstanding the foregoing objections and without waiving any objection, WorldCom would answer this request by stating that WorldCom has no documents responsive to this request.

18. **Provide all documents that discuss or analyze utilizing facilities or services of any company other than BellSouth to provide telephone exchange or exchange access services in Florida.**

Response: Pursuant to the General Objections stated above, WorldCom objects to Item 18 on the grounds that the information sought 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, the request seeks information that is overly broad, unduly burdensome and oppressive and seeks information that is subject to the trade secret privilege. Notwithstanding any of the foregoing objections and without waiving any objection, WorldCom would answer this request by stating that WorldCom has no documents responsive to this request.

19. **Provide all documents that discuss or analyze utilization of private line facilities that interconnect with interexchange carriers, including usage, costs and revenues in Florida.**

Response: Pursuant to the General Objections stated above, WorldCom objects to Item 19 on the grounds that the information sought 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, the request seeks information that is overly broad, unduly burdensome and oppressive and seeks information that is subject to the trade secret privilege. Notwithstanding the foregoing objections and without waiving any objection, WorldCom would respond to this request by stating that WorldCom has no documents responsive to this request.

20. **Provide all documents that discuss or analyze any LDDS WorldCom plans to utilize its existing telephone network or support facilities to provide telephone exchange or exchange access service in Florida.**

Response: Pursuant to the General Objections stated above, WorldCom objects to Item 20 on the grounds that the information sought 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 and therefore any information regarding its network facilities is irrelevant. In addition, the request seeks information that is subject to the attorney\client, work product and trade secret privileges. Notwithstanding the foregoing objections and without waiving any objection, WorldCom would answer this request by stating that WorldCom has no documents responsive to this request.

21. **Provide all documents that discuss or analyze any LDDS WorldCom plans to construct, expand or alter network or support facilities to provide telephone exchange or exchange access service in Florida.**

Response: Pursuant to the General Objections stated above, WorldCom objects to Item 21 on the grounds that the information sought 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 and therefore any information regarding its network facilities is irrelevant. In addition, the request seeks information that is subject to the attorney\client, work product and trade secret privileges. Notwithstanding the

foregoing objections and without waiving any objection, WorldCom would answer this request by stating that WorldCom has no documents responsive to this request.

22. **Provide all documents that discuss or analyze LDDS WorldCom's ability and plans to monitor service and network quality provided by non-BellSouth provider(s) of telephone exchange or exchange access service in Florida.**

Response: Pursuant to the General Objections stated above, WorldCom objects to Item 22 on the grounds that 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 request by stating that WorldCom has no documents responsive to this request.

23. **Provide all documents that discuss or analyze LDDS WorldCom's ability and plans to monitor service, unbundled element and network quality provided by BellSouth in Florida to LDDS WorldCom.**

Response: Pursuant to the General Objections stated above, WorldCom objects to Item 23 on the grounds that the information sought 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 and therefore any information regarding its network facilities is

irrelevant. In addition, the request seeks information that is subject to the attorney\client, work product and trade secret privileges. Notwithstanding the foregoing objections and without waiving any objection, WorldCom would answer this request by stating WorldCom has no documents responsive to this request.

24. **Provide all documents that discuss or analyze requests for LDDS WorldCom to provide electronic ordering and gateways for international circuits, LDDS WorldCom's responses to those requests and any actions LDDS WorldCom has taken to provide such electronic ordering and gateways.**

Response: Pursuant to the General Objections stated above, WorldCom objects to Item 24 on the grounds that it 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. Notwithstanding the foregoing objections and without waiving any objection, WorldCom would answer this request by stating that WorldCom has no documents responsive to this request.

25. **Provide all documents that discuss or analyze the competitive strengths and weaknesses of BellSouth as a provider of interLATA services, including any analyses of, or comparisons involving, BellSouth's network and customer service capabilities for providing interLATA service.**

Response: Pursuant to the General Objections stated above, WorldCom objects to Item 25 on the grounds that the information sought 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, the request is overly broad, speculative and ambiguous and therefore burdensome and oppressive. Notwithstanding the foregoing objections and without waiving any objections, WorldCom would answer this request by stating that WorldCom has no documents responsive to this request.

26. **Provide all documents that discuss or analyze the possibility that BellSouth will offer packages of telecommunications services to Florida consumers, including for example, telephone exchange and interLATA service, if it enters the interLATA business and the effects that such offerings may have on consumers, LDDS WorldCom or other firms.**

Response: Pursuant to the General Objections stated above, WorldCom objects to Item 26 on the grounds that the information sought 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, the request is overly broad, speculative and ambiguous and therefore burdensome and oppressive. Notwithstanding the foregoing objections and without waiving any objection, WorldCom would answer this request by stating it has no documents responsive to this request.

27. **Provide all documents that discuss or analyze any LDDS WorldCom plans to offer packages of telecommunications services to Florida consumers including, for example, telephone exchange and interLATA service.**

Response: Pursuant to the General Objections stated above, WorldCom objects to Item 27 on the grounds that the request 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 and therefore any information regarding its network facilities is irrelevant. Notwithstanding the foregoing and without waiving any objection, WorldCom would answer this request by stating that WorldCom has no documents responsive to this request.

28. **Provide all documents that discuss, analyze or project future pricing of interLATA services to Florida consumers.**

Response: Pursuant to the General Objections stated above, WorldCom objects to Item 28 on the grounds that the information sought 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, the request is speculative, vague and overly broad and therefore is burdensome and oppressive. Notwithstanding the

foregoing objections and without waiving any objection, WorldCom would answer this request by stating that WorldCom has no documents responsive to this request.


29. **Provide all documents that discuss or analyze any effects that BellSouth's entry into the business of providing interLATA service may have on Florida consumers or on the interLATA business in Florida.**

Response: Pursuant to the General Objections stated above, WorldCom objects to Item 29 on the grounds that the information sought 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, the request is speculative, vague and overly broad and therefore is burdensome and oppressive. Notwithstanding the foregoing objections and without waiving any objections, WorldCom would answer this request by stating that WorldCom has no documents responsive to this request.

30. **Provide all documents that compare or contrast BellSouth's potential long distance network with the network of any current interexchange carrier.**

Response: Pursuant to the General Objections stated above, WorldCom objects to Item 30 on the grounds that the request is overly broad, burdensome and oppressive. Notwithstanding the foregoing objections and without waiving any objection, WorldCom would answer this request by stating that WorldCom has no documents responsive to this request.

Respectfully submitted,
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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 Request for Productions of Documents 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:

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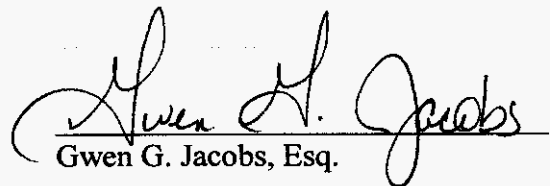
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