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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 Response and Objections to BellSouth's First Set of Interrogatories and MCI's Response and 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,

R.D.M.

Richard D. Melson

RDM/cc
Enclosures
cc: Parties of Record

79858.1

*Interrogatories
response & objections* *request for
production of doc.*
DOCUMENT NUMBER-DATE DOCUMENT NUMBER-DATE
to 12669 NOV 26 88 12670 NOV 26 88
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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, MCI 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

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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.

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RESPONSES AND OBJECTIONS TO SPECIFIC INTERROGATORIES

Subject to, and without waiver of, the foregoing general objections, MCI responds as follows to BellSouth's 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 No. 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.

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 not within the scope of this proceeding.

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Interrogatory No. 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.

MCI Response: MCI has not completed the total public interest analysis that it intends to perform before the hearing in this docket. Nevertheless, the general areas of potential harm to the public interest are discussed in the attached manuscript entitled "The Scope of Competition in Telecommunications" by B. Douglas Bernheim and Robert D. Willig. The record developed in December, 1994 on the Motion to Vacate the Final Judgement filed by four of the RBOCs, including BellSouth, in the U.S. District Court for the District of Columbia, contains additional support to document the harm to the public interest that will result from in-region long distance entry.

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

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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

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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.

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RESPECTFULLY SUBMITTED this 26th day of November, 1996.

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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 26th day of November, 1996.

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