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September 22, 1997

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

Re: Docket ~~970887~~ PI

Dear Ms. Bayó:

Enclosed for filing in the above docket on behalf of MCI Telecommunications Corporation are the original and 15 copies of MCI's Objections to Citizens First Set of Requests for Production of Documents.

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

Very truly yours,



Richard D. Nelson

- ACK _____
- AFA _____
- APP 1 RDM/cc
- CAF _____ Enclosures
- _____ cc: Service List
- CMLI _____
- CTR _____
- EAG _____
- LEJ _____
- LIN 5 _____
- OPC _____
- RTP _____
- SEC 1 _____
- WAS _____
- OTH _____

DOCUMENT NUMBER-DATE

~~09653~~ SEP 22 5

FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed Rule 25-24.845,)
F.A.C., Customer Relations;)
Rules Incorporated, and proposed)
amendments to Rules 25-4.003,)
F.A.C., Customer Billing; 25-)
4.118, F.A.C., Interexchange)
Carrier Selection; 25-24.490,)
F.A.C., Customer Relations;)
Rules Incorporated)

Docket No. 970882-TI

Filed: September 22, 1997

MCI TELECOMMUNICATIONS CORPORATION'S
OBJECTIONS TO CITIZENS'
FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS

MCI Telecommunications Corporation ("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 submits the following Objections to Citizens' First Set of Requests for Production of Documents 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 the procedural order previously issued in the above-referenced docket. Should additional grounds for objection be discovered as MCI prepares its Responses to the above-referenced Request for Production of Documents, MCI reserves the right to supplement, revise, or modify its objections at the time that it serves its Responses on the Citizens. Moreover, should MCI determine that a Protective Order is necessary with respect to any of the material requested by the Citizens, MCI reserves the right

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DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

to file a motion with the Commission seeking such an order at the time it serves its Response on the Citizens.

GENERAL OBJECTIONS

MCI makes the following general objections to Citizens' First Set of Requests for Production of Documents.

1. MCI objects to the definition of "you" and "your" 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 Citizens' requests to apply to MCI's regulated intrastate operations in Florida and will limit its responses 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 requests as irrelevant, overly broad, unduly burdensome and oppressive.

3. MCI objects to Requests for Production Nos. 1 through 13 and all instructions to the extent that these requests and instructions call 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 Requests for Production Nos. 1 through 13 on the grounds that the requests are vague, ambiguous, overly broad, imprecise, and utilize terms subject to multiple interpretations and not properly defined or explained for purposes of these requests. Any responses provided by MCI in response to Citizens' requests will be provided subject to, and without waiver of, the foregoing objection.

5. MCI objects to Requests for Production Nos. 1 through 13 on the grounds that the documents requested are not reasonably calculated to lead to the discovery of admissible evidence and are not relevant to the subject matter of this action.

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


7. MCI objects to Requests for Production Nos. 1 through 13 to the extent that these requests require information that is already in the public record before the Florida Public Service Commission.

8. MCI objects to Requests for Production Nos. 1 through 13 as being unduly burdensome, expensive, oppressive, and excessively time consuming as written. MCI asserts this same objection with respect to each and every general instruction and definition to the extent applicable.

9. MCI objects to Requests for Production Nos. 1, 2, 4 through 9, and 10 through 12 on the grounds that the information requested includes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. In addition, to the extent that Citizens' requests require a response that includes proprietary confidential business information which is not subject to the "trade secrets" privilege, MCI will make such information available to Public Counsel upon the entry of an appropriate Protective Agreement, subject to any other general or specific objection contained herein.

RESPECTFULLY SUBMITTED this 22nd day of September, 1997.

HOPPING GREEN SAMS & SMITH, P.A.

By: 
Richard D. Melson
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(904) 425-2313

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 this 22nd day of September, 1997.

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