

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into)
Pricing of Unbundled Network)
Elements.)
_____)

Docket No. 990649-TP
Filed: November 18, 1999

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**AT&T'S AND MCI WORLDCOM'S OBJECTIONS TO THE STAFF OF THE
FLORIDA PUBLIC SERVICE COMMISSION'S
FIRST SET OF INTERROGATORIES TO AT&T AND MCI WORLDCOM**

AT&T Communications of the Southern States, Inc. and MCI WorldCom, Inc. (hereinafter "AT&T" and "MCI 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 submit the following objections to the Staff of the Florida Public Service Commission's ("Staff's") First Set of Interrogatories to AT&T Communications of the Southern States, Inc. and MCI Worldcom, Inc. and its Operating Subsidiaries.

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 Order No. PSC-99-1397-PCO-TP issued by the Florida Public Service Commission in the above-referenced docket on July 20, 1999. Should additional grounds for objection be discovered as AT&T and MCI WorldCom prepare their answers to the above-referenced set of interrogatories, AT&T and MCI WorldCom reserve the right to supplement, revise, or modify their objections at the time that they serve their answers on Staff. Moreover, should AT&T and MCI WorldCom determine that a protective order is necessary with respect to any of the material requested by Staff, AT&T and MCI WorldCom reserve the right to file a motion

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with the Commission seeking such an order at the time that they serve their answers on Staff.

General Objections

AT&T and MCI WorldCom make the following General Objections to Staff's First Set of Interrogatories which will be incorporated by reference into AT&T's and MCI WorldCom's specific responses when their answers are served on Staff.

1. AT&T and MCI WorldCom object to the following provisions of Staff's First Set of Interrogatories to the extent that such interrogatories seek to impose an obligation on AT&T and MCI WorldCom to respond on behalf of MCI WorldCom's or AT&T's operating subsidiaries, their employees and authorized agents, on the grounds that such definition is overly broad, unduly burdensome, oppressive and not permitted by applicable discovery rules. In particular, AT&T and MCI WorldCom each object to the implication that either AT&T or MCI WorldCom is being required to respond on behalf of the other. While MCI WorldCom and AT&T are jointly sponsoring the testimony of certain witnesses, MCI WorldCom is not affiliated or associated with AT&T in any way; nor is AT&T affiliated with MCI WorldCom. Without waiver of their general objection, and subject to other general and specific objections, answers will be provided on behalf of AT&T and MCI WorldCom which are the respective entities certificated to provide regulated telecommunications services in Florida and which are parties to this docket. All references to "AT&T" in responding to Staff's First Set of Interrogatories should be taken to mean AT&T Communications of the Southern States, Inc. All references to "MCI WorldCom" in responding to Staff's First Set of Interrogatories should be taken to mean MCI WorldCom, Inc.

2. Unless otherwise indicated, AT&T and MCI WorldCom have interpreted Staff's interrogatories to apply to AT&T's and MCI WorldCom's regulated intrastate operations in Florida and will limit their answers accordingly. To the extent that any interrogatory is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the commission, AT&T and MCI WorldCom object to such interrogatory as irrelevant, overly broad, unduly burdensome, and oppressive.

3. AT&T and MCI WorldCom object 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. AT&T and MCI WorldCom object 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 AT&T and MCI WorldCom in response to Staff's interrogatories will be provided subject to, and without waiver of, the foregoing objection.

5. AT&T and MCI WorldCom object 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. AT&T and MCI WorldCom will attempt to note each instance where this objection applies.

6. AT&T and MCI WorldCom object to Staff's general instructions, definitions or specific discovery requests insofar as they seek to impose obligations on

AT&T and MCI WorldCom which exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

7. AT&T and MCI WorldCom object to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

8. AT&T and MCI WorldCom object to each and every interrogatory, general instruction or definition insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. AT&T and MCI WorldCom object 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 Staff's interrogatories request proprietary confidential business information which is not subject to the "trade secrets" privilege, AT&T and MCI WorldCom will make such information available to counsel for Staff pursuant to an appropriate protective agreement, subject to any other general or specific objections contained herein.

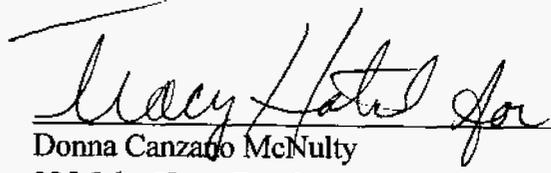
Objections to Specific Interrogatories

Subject to, and without waiver of, the foregoing general objections, AT&T and MCI WorldCom enters the following specific objections with respect to Staff's interrogatories:

INTERROGATORY NO. 1: Without waiver, AT&T and MCI WorldCom will provide the requested information in their possession, custody or control.

INTERROGATORY NO. 2: Without waiver, AT&T and MCI WorldCom will provide the requested information in their possession, custody or control.

Submitted this 18th day of November, 1999.



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CERTIFICATE OF SERVICE
DOCKET 990649-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via
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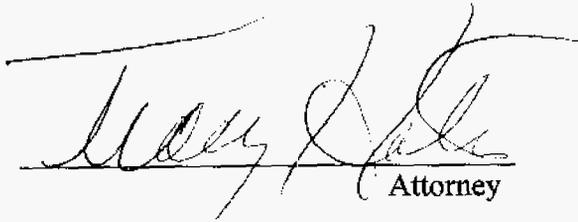
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