

June 28, 2000

**ORIGINAL**

**RECORDS AND REPORTING**

**00 JUN 28 PM 3:56**

**RECEIVED-PPSC**

Ms. Blanca Bayó, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Docket No. 990649-TP

Dear Ms. Bayó,

Enclosed for filing in the above-referenced docket are an original and fifteen (15) copies each of MCI WorldCom, Inc.'s Objections to BellSouth Telecommunications, Inc.'s First Request for Production of Documents and First Set of Interrogatories.

Copies of the foregoing are being served on all parties of record in accordance with the attached Certificate of Service.

Thank you for your assistance with this matter.

Sincerely,

*Donna Canzano McNulty*  
Donna Canzano McNulty

Enclosures

- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP 00000000
- COM 5
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- LEG 2
- OPC \_\_\_\_\_
- PAI \_\_\_\_\_
- RCO \_\_\_\_\_
- SEC 1
- SER \_\_\_\_\_
- OTH \_\_\_\_\_

RECEIVED & FILED

*mm*  
PPSC-BUREAU OF RECORDS

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of )  
unbundled network elements )  
\_\_\_\_\_ )

Docket No. 990649-TP

Filed: June 26, 2000

ORIGINAL

**MCI WORLDCOM'S OBJECTIONS TO  
BELLSOUTH TELECOMMUNICATIONS, INC'S  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

MCI WorldCom, Inc., and its operating subsidiaries (hereinafter "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 submits the following Objections to BellSouth Telecommunications, Inc's (hereinafter "BellSouth") First Request for Production of Documents.

**The Objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the five-day requirement set forth in Order No. PSC-00-2015-PCO-TP issued by the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced docket on June 8, 2000. Should additional grounds for objection be discovered as MCI WorldCom prepares its Answers to the above-referenced discovery request, MCI WorldCom reserves the right to supplement, revise, or modify its objections at the time that it serves its Answers on BellSouth. Moreover, should MCI WorldCom determine that a Protective Order is necessary with respect to any of the material requested by BellSouth, MCI WorldCom reserves the right to file a motion with the Commission seeking such an order at the time that it serves its Answers on BellSouth.**

DOCUMENT NUMBER-DATE

07881 JUN 28 8

FPSC-RECORDS/REPORTING

## General Objections

MCI WorldCom makes the following General Objections to BellSouth's First Set of Requests for Production of Documents that will be incorporated by reference into MCI WorldCom's specific responses when its Responses are served on BellSouth.

1. MCI WorldCom objects to BellSouth's First Set of Requests for Production of Documents to the extent that it is overly broad, unduly burdensome, oppressive, not permitted by applicable discovery rules, and would require MCI WorldCom to disclose information which is privileged.

2. MCI WorldCom has interpreted BellSouth's requests to apply to MCI WorldCom'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 WorldCom objects to such request as irrelevant, overly broad, unduly burdensome, and oppressive.

3. MCI WorldCom objects to each and every request and instruction to the extent that such request or instruction calls for information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege or other applicable privilege.

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

5. MCI 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. MCI WorldCom will attempt to note each instance where this objection applies.

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

7. MCI WorldCom objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

8. MCI WorldCom objects to each and every request, general instruction, or definition insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. MCI WorldCom 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's requests seek proprietary confidential business information which is not the subject of the "trade secrets" privilege, MCI 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.

10. MCI WorldCom is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, MCI WorldCom creates countless documents that are not subject to Florida Public Service Commission or FCC retention of records requirements. These documents are kept in

numerous locations and are frequently moved from site to site as employees change jobs or as the business is reorganized. Rather, these responses will provide all of the information obtained by MCI WorldCom after a reasonable and diligent search conducted in connection with this discovery request. MCI WorldCom will comply with BellSouth's request that a search be conducted of those files that are reasonably expected to contain the requested information. To the extent that the discovery request purports to require more, MCI WorldCom objects on the grounds that compliance would impose an undue burden or expense.

11. MCI WorldCom objects to the definitions of "MCI" to the extent that such definitions seek to impose an obligation 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. Without waiver of its general objection, and subject to other general and specific objections, Answers will be provided on behalf of MCI WorldCom Inc.'s certificated entities that provide regulated telecommunications services in Florida and are applicable to this docket.

12. MCI WorldCom objects to the definitions of "you" and "your" to the extent that such definitions seek to impose an obligation on MCI WorldCom, Inc. and its operating subsidiaries certificated in Florida, 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. Without waiver of its general objection, and subject to other general and specific objections, Answers will be provided on behalf of the MCI

WorldCom, Inc. operating subsidiaries that are certificated to provide regulated telecommunications services in Florida.

Objections to Specific Requests

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

**REQUEST 2:** Produce all documents furnished or provided by MCI or on MCI's behalf to its shareholders, accountants, auditors, creditors, or to stock analysts referring or relating to the economic lives or useful lives used by MCI for depreciation purposes for the switches, cable, and digital circuit equipment MCI uses to provide telephone exchange service or interLATA service in Florida.

**OBJECTION:** MCI WorldCom objects to Request for Production of Documents No. 2 on the grounds that 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. Moreover, MCI WorldCom objects to Request for Production of Documents No. 2 on the grounds that it is overly broad and unduly burdensome.

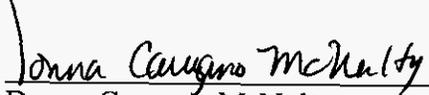
**REQUEST 3:** Produce all documents furnished or provided by MCI or on MCI's behalf to its shareholders, accountants, auditors, creditors, or to stock analysts referring or relating to the economic lives or useful lives used by MCI for depreciation purposes for fixed wireless equipment MCI uses to provide telephone exchange service or interLATA service in Florida.

**OBJECTION:** MCI WorldCom objects to Request for Production of Documents No. 3 on the grounds that 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. Moreover, MCI WorldCom objects to Request for Production of Documents No. 3 on the grounds that it is overly broad and unduly burdensome.

**REQUEST 4:** Produce all documents furnished or provided by MCI or on MCI's behalf to its shareholders, accountants, auditors, creditors, or to stock analysts referring or relating to the economic lives or useful lives used by MCI for depreciation purposes for cable television plant or equipment MCI uses to provide telephone exchange service or interLATA service in Florida.

**OBJECTION:** MCI WorldCom objects to Request for Production of Documents No. 4 on the grounds that 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. Moreover, MCI WorldCom objects to Request for Production of Documents No. 4 on the grounds that it is overly broad and unduly burdensome.

Respectfully submitted,

  
\_\_\_\_\_  
Donna Canzano McNulty  
MCI WorldCom, Inc.  
325 John Knox Road, Ste. 105  
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Attorney for MCI WorldCom, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U.S. Mail, hand delivered (\*) or Federal Express (\*\*) this 28th day of June, 2000.

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\_\_\_\_\_  
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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into pricing of )  
unbundled network elements )  
\_\_\_\_\_ )

Docket No. 990649-TP

Filed: June 26, 2000

**MCI WORLDCOM'S OBJECTIONS TO BELL SOUTH  
TELECOMMUNICATIONS, INC.'S  
FIRST SET OF INTERROGATORIES**

MCI WorldCom, Inc., and its operating subsidiaries (hereinafter "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 submits the following Objections to BellSouth Telecommunications, Inc.'s (hereinafter "BellSouth") First Set of Interrogatories to MCI WorldCom Inc.

**The Objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the five-day requirement set forth in Order No. PSC-00-2015-PCO-TP issued by the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced docket on June 8, 2000. Should additional grounds for objection be discovered as MCI WorldCom prepares its Answers to the above-referenced discovery request, MCI WorldCom reserves the right to supplement, revise, or modify its objections at the time that it serves its Answers on BellSouth. Moreover, should MCI WorldCom determine that a Protective Order is necessary with respect to any of the material requested by BellSouth, MCI WorldCom reserves the right to file a motion with the Commission seeking such an order at the time that it serves its Answers on BellSouth.**

## General Objections

MCI WorldCom makes the following General Objections to BellSouth's First Set of Interrogatories that will be incorporated by reference into MCI WorldCom's specific responses when its Answers are served on BellSouth.

1. MCI WorldCom objects to the following provisions of the "Definitions" section of BellSouth's First Set of Interrogatories:

MCI WorldCom objects to the definitions of "MCI" to the extent that such definitions seek to impose an obligation 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. Without waiver of its general objection, and subject to other general and specific objections, Answers will be provided on behalf of its certificated entities in Florida applicable to this proceeding.

2. Unless otherwise indicated, MCI WorldCom has interpreted BellSouth's interrogatories to apply to MCI WorldCom's regulated intrastate operations in Florida and will limit its 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, MCI WorldCom objects to such interrogatory as irrelevant, overly broad, unduly burdensome, and oppressive.

3. MCI WorldCom objects to each and every interrogatory and instruction to the extent that such interrogatory or instruction calls for information that is exempt from

discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

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

5. MCI 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. MCI WorldCom will attempt to note each instance where this objection applies.

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

7. MCI WorldCom objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

8. MCI WorldCom 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 WorldCom 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 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.

**Objections to Specific Interrogatories**

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

**INTERROGATORY 3:** If the answer to the foregoing Interrogatory is in the affirmative, please identify all counties in Florida where MCI currently provides telephone exchange service, state the date when MCI began providing such service, and describe with particularity the network MCI uses to provide such service in Florida.

**OBJECTION:** MCI WorldCom objects to this interrogatory 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.

**INTERROGATORY 5:** If the answer to the foregoing Interrogatory is in the affirmative, for each switch owned or operated by MCI to provide telephone exchange service in the State of Florida, please:

- (a) identify the location of each such switch;
- (b) describe the type of switch (e.g., Digital Electronic, ATM);
- (c) state the date when the switch was placed; and
- (d) state the planned retirement date of each such switch

**OBJECTION:** MCI WorldCom objects to this interrogatory 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.

**INTERROGATORY 6:** If the answer to Interrogatory number 4 is in the affirmative, please provide the total investment of switches (by type of switch, if available) that MCI owns or operates to provide telephone exchange service in the State of Florida.

**OBJECTION:** MCI WorldCom objects to this interrogatory 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.

**INTERROGATORY 7:** Please state the economic lives or useful lives used by MCI for depreciation purposes for the switches it owns or operates to provide telephone exchange service in Florida, including the extent to which such lives vary depending upon the type of switch involved (e.g., Digital Electronic, ATM, etc.). In answering this Interrogatory, please identify all documents referring or relating to the economic lives or useful lives used by MCI for depreciation purposes for the switches it owns or operates to provide telephone exchange service in Florida.

**OBJECTION:** MCI WorldCom objects to this interrogatory 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. Moreover, in Rule 51.505, the FCC states that the total element long-run incremental cost (TELRIC) of an element should be based on the ILEC's forward-looking costs. Therefore, the lives that ALECs use to depreciate their plant and equipment for internal use or financial reporting purposes are irrelevant.

**INTERROGATORY 9:** If the answer to the foregoing Interrogatory is in the affirmative, please:

- (a) state the cable route miles currently in place;
- (b) describe the type of cable in place (e.g., Fiber Cable, Metallic Cable, Coaxial Cable, Hybrid Fiber/Coaxial Cable, etc.);
- (c) provide the total investment in cable (by type of cable, if available) that MCI owns or operates to provide telephone exchange service in the State of Florida.

**OBJECTION:** MCI WorldCom objects to this interrogatory 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.

**INTERROGATORY 10:** Please state the economic lives or useful lives used by MCI for depreciation purposes for the cable it owns or operates to provide telephone exchange service in Florida, including the extent to which such lives vary depending upon the type of cable involved (e.g., Fiber Cable, Metallic Cable, Coaxial Cable, Hybrid Fiber/Coaxial Cable, etc.). In answering this Interrogatory, please identify all documents referring or relating to the economic lives or useful lives used by MCI for depreciation purposes for the cable it owns or operates to provide telephone exchange service in Florida.

**OBJECTION:** MCI WorldCom objects to this interrogatory 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. Moreover, in Rule 51.505, the FCC states that the total element long-run incremental cost (TELRIC) of an element should be based on the ILEC's forward-looking costs. Therefore, the lives that ALECs use to depreciate their plant and equipment for internal use or financial reporting purposes are irrelevant.

**INTERROGATORY 12:** If the answer to the foregoing Interrogatory is in the affirmative, please:

- (a) describe the type of digital circuit equipment in place (e.g., carrier, optical, amplification, signaling);
- (b) provide the total investment in digital circuit equipment (by type of equipment, if available) that MCI owns or operates to provide telephone exchange service in the State of Florida.

**OBJECTION:** MCI WorldCom objects to this interrogatory 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.

**INTERROGATORY 13:** Please state the economic lives or useful lives used by MCI for depreciation purposes for the digital circuit equipment it owns or operates to provide telephone exchange service in Florida, including the extent to which such lives vary depending upon the type of digital circuit equipment involved (e.g., carrier, optical, amplification, signaling). In answering this Interrogatory, please identify all documents referring or relating to the economic lives or useful lives used by MCI for depreciation purposes for the digital circuit equipment it owns or operates to provide telephone exchange service in Florida.

**OBJECTION:** MCI WorldCom objects to this interrogatory 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. Moreover, in Rule 51.505, the FCC states that the total element long-run incremental cost (TELRIC) of an element should be based on the

ILEC's forward-looking costs. Therefore, the lives that ALECs use to depreciate their plant and equipment for internal use or financial reporting purposes are irrelevant.

**INTERROGATORY 15:** If the answer to the foregoing Interrogatory is in the affirmative, please identify all counties in Florida where MCI currently provides interLATA service, state the date when MCI began providing such service, and describe with particularity the network MCI uses to provide such service in Florida.

**OBJECTION:** MCI WorldCom objects to this interrogatory 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.

**INTERROGATORY 17:** If the answer to the foregoing Interrogatory is in the affirmative, for each switch owned or operated by MCI to provide interLATA service in the State of Florida, please:

- (a) identify the location of each such switch;
- (b) describe the type of switch (e.g., Digital Electronic, ATM);
- (c) state the date when the switch was placed; and
- (d) state the planned retirement date of each such switch

**OBJECTION:** MCI WorldCom objects to this interrogatory 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.

**INTERROGATORY 18:** If the answer to Interrogatory number 16 is in the affirmative, please provide the total investment of switches (by type of switch, if available) that MCI owns or operates to provide interLATA service in the State of Florida.

**OBJECTION:** MCI WorldCom objects to this interrogatory 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.

**INTERROGATORY 19:** Please state the economic lives or useful lives used by MCI for depreciation purposes for the switches it owns or operates to provide interLATA service in Florida, including the extent to which such lives vary depending upon the type of switch involved (e.g., Digital Electronic, ATM, etc.). In answering this Interrogatory, please identify all documents referring or relating to the economic lives or useful lives used by MCI for depreciation purposes for the switches it owns or operates to provide interLATA service in Florida.

**OBJECTION:** MCI WorldCom objects to this interrogatory 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. Moreover, in Rule 51.505, the FCC states that the total element long-run incremental cost (TELRIC) of an element should be based on the ILEC's forward-looking costs. Therefore, the lives that ALECs use to depreciate their plant and equipment for internal use or financial reporting purposes are irrelevant.

**INTERROGATORY 21:** If the answer to the foregoing Interrogatory is in the affirmative, please:

- (a) state the cable route miles currently in place;
- (b) describe the type of cable in place (e.g., Fiber Cable, Metallic Cable, Coaxial Cable, Hybrid Fiber/Coaxial Cable, etc.);
- (c) provide the total investment in cable (by type of cable, if available) that MCI owns or operates to provide interLATA service in the State of Florida.

**OBJECTION:** MCI WorldCom objects to this interrogatory 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.

**INTERROGATORY 22:** Please state the economic lives or useful lives used by MCI for depreciation purposes for the cable it owns or operates to provide interLATA service in Florida, including the extent to which such lives vary depending upon the type of cable involved (e.g., Fiber Cable, Metallic Cable, Coaxial Cable, Hybrid Fiber/Coaxial Cable, etc.). In answering this Interrogatory, please identify all documents referring or relating to the economic lives or useful lives used by MCI for depreciation purposes for the cable it owns or operates to provide interLATA service in Florida.

**OBJECTION:** MCI WorldCom objects to this interrogatory 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. Moreover, in Rule 51.505, the FCC states that the total element long-run incremental cost (TELRIC) of an element should be based on the

ILEC's forward-looking costs. Therefore, the lives that ALECs use to depreciate their plant and equipment for internal use or financial reporting purposes are irrelevant.

**INTERROGATORY 24:** If the answer to the foregoing Interrogatory is in the affirmative, please:

- (a) describe the type of digital circuit equipment in place (e.g., carrier, optical, amplification, signaling);
- (b) provide the total investment in digital circuit equipment (by type of equipment, if available) that MCI owns or operates to provide interLATA service in the State of Florida.

**OBJECTION:** MCI WorldCom objects to this interrogatory 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.

**INTERROGATORY 25:** Please state the economic lives or useful lives used by MCI for depreciation purposes for the digital circuit equipment it owns or operates to provide interLATA service in Florida, including the extent to which such lives vary depending upon the type of digital circuit equipment involved. In answering this Interrogatory, please identify all documents referring or relating to the economic lives or useful lives used by MCI for depreciation purposes for the digital circuit equipment it owns or operates to provide interLATA service in Florida.

**OBJECTION:** MCI WorldCom objects to this interrogatory 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. Moreover, in Rule 51.505, the FCC states that the total element long-run incremental cost (TELRIC) of an element should be based on the ILEC's forward-looking costs. Therefore, the lives that ALECs use to depreciate their plant and equipment for internal use or financial reporting purposes are irrelevant.

**INTERROGATORY 26:** Does MCI currently offer or plan to offer fixed wireless service to provide telephone exchange service or interLATA service in Florida?

**OBJECTION:** MCI WorldCom objects to this interrogatory 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.

**INTERROGATORY 27:** If the answer to the foregoing Interrogatory is in the affirmative, please provide the economic lives or useful lives of the fixed wireless equipment (based on the classification of plant in MCI's accounting records) which MCI uses or expects to use to provide such service in Florida. In answering this Interrogatory, please identify all documents referring or relating to such economic lives or useful lives.

**OBJECTION:** MCI WorldCom objects to this interrogatory 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. Moreover, in Rule 51.505, the FCC states that the total element long-run incremental cost (TELRIC) of an element should be based on the ILEC's forward-looking costs. Therefore, the lives that ALECs use to depreciate their plant and equipment for internal use or financial reporting purposes are irrelevant.

**INTERROGATORY 28:** If the answer to Interrogatory No. 26 is in the affirmative, describe with particularity the rates, terms, conditions, nature, and purpose of the fixed wireless service that MCI offers or plans to offer to provide telephone exchange service or interLATA service in Florida. In answering this Interrogatory, state whether MCI intends for its fixed wireless service to be used to bypass BellSouth's network and identify all documents referring or relating to any such intention.

**OBJECTION:** MCI WorldCom objects to this interrogatory 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.

**INTERROGATORY 29:** Does MCI currently provide or plan to provide telephone exchange service or interLATA service in Florida using cable television plant or equipment?

**OBJECTION:** MCI WorldCom objects to this interrogatory 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.

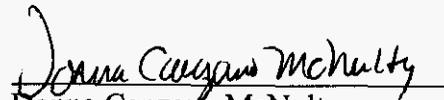
**INTERROGATORY 30:** If the answer to the foregoing Interrogatory is in the affirmative, please provide the economic lives or useful lives of the cable television plant or equipment (based on the classification of plant in MCI's accounting records) which MCI uses or expects to use to provide such service in Florida. In answering this Interrogatory, please identify all documents referring or relating to such economic lives or useful lives.

**OBJECTION:** MCI WorldCom objects to this interrogatory 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. Moreover, in Rule 51.505, the FCC states that the total element long-run incremental cost (TELRIC) of an element should be based on the ILEC's forward-looking costs. Therefore, the lives that ALECs use to depreciate their plant and equipment for internal use or financial reporting purposes are irrelevant.

**INTERROGATORY 31:** If the answer to Interrogatory No. 29 is in the affirmative, describe with particularity the rates, terms, conditions, nature, and purpose of any service that MCI offers or plans to offer to provide telephone exchange service or interLATA service in Florida using cable television plant or equipment. In answering this Interrogatory, state whether MCI intends for cable television plant or equipment to be used to bypass BellSouth's network and identify all documents referring or relating to any such intention.

**OBJECTION:** MCI WorldCom objects to this interrogatory 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.

Respectfully submitted,

  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U.S. Mail, hand delivered (\*) or Federal Express (\*\*) this 28th day of June, 2000.

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