

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the pricing of unbundled network elements)
)
)

Docket No. 990649-TP

Filed: July 3, 2000

MCI WORLDCOM, INC.'S RESPONSES TO
GTE FLORIDA INCORPORATED'S
FIRST SET OF INTERROGATORIES (NOS. 1-8)

MCI WorldCom, Inc, and its operating subsidiaries (hereafter "MCI WorldCom") pursuant to Rules 28-106.206, Florida Administrative Code, and Rules 1.340 and 1.280, Florida Rules of Civil Procedure, hereby submits the following Response to GTE Florida Incorporated's First Set of Interrogatories (Nos. 1-8).

INTERROGATORIES

INTERROGATORY NO. 1: Please provide, by account, the depreciation lives and salvage values that MCI WorldCom uses to depreciate its plant and equipment.

OBJECTION: MCI WorldCom objects to this interrogatory because 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 NO. 2: Please provide the depreciation rate MCI WorldCom applies to each of its plant and equipment accounts.

OBJECTION: MCI WorldCom objects to this interrogatory because 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.

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

INTERROGATORY NO. 3: MCI WorldCom has announced trials of "fixed wireless" MMDS service. Please describe MCI WorldCom's plans to provide service in Florida using fixed wireless technology, including the date such service will be initiated.

OBJECTION: MCI WorldCom objects to this interrogatory because 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 NO. 4: Please provide, by account, the depreciation lives and salvage values MCI WorldCom uses to depreciate its fixed wireless equipment.

OBJECTION: MCI WorldCom objects to this interrogatory because 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 NO. 5: Does MCI WorldCom plan to offer local telephone service in Florida over any of its own or any affiliates' facilities any time within the next three years? If so, please describe such plans, including the projected date such service will be initiated and the areas in which service will be provided.

OBJECTION: MCI WorldCom objects to this interrogatory because 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 NO. 6: Please describe and identify, by location, any and all switches and cable routes owned or operated by MCI WorldCom in Florida.

OBJECTION: MCI WorldCom objects to this interrogatory because 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.

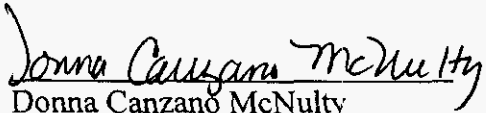
INTERROGATORY NO. 7: Please list any customers, either business or residential, by serving location, to which MCI WorldCom provides local telephone service in Florida.

OBJECTION: MCI WorldCom objects to this interrogatory because 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, to the extent this request seeks customer specific information, MCI WorldCom is prohibited by Section 364.24, Florida Statutes, from disclosing customer account information except as authorized by the customer or as necessary for billing purposes, or required by subpoena, court order, other process of court, or as otherwise allowed by law.

INTERROGATORY NO. 8: Please provide, by account, the depreciation lives and salvage values that MCI WorldCom or any affiliate uses to depreciate plant and equipment used to provide local telephone service in Florida.

OBJECTION: MCI WorldCom objects to this interrogatory because 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 3rd day of July, 2000.

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