

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of MCImetro Access)
 Transmission Services, LLC and MCI)
 WorldCom Communications, Inc. For) Docket No. 000649-TP
 Arbitration of Certain Terms and)
 Conditions of Proposed Agreement With) Filed: July 31, 2000
 BellSouth Telecommunications, Inc.)
 Concerning Interconnection and Resale)
 Under the Telecommunications Act of)
 1996)

NOTICE OF SERVICE OF
 MCI WORLDCOM'S
 OBJECTIONS TO BELL SOUTH'S FIRST REQUEST
 FOR PRODUCTION OF DOCUMENTS

MCImetro Access Transmission Services, LLC and MCI WORLDCOM
 Communications, Inc. hereby gives notice of service of its Notice
 of Objections to BellSouth Telecommunication, Inc.'s
 Production of Documents.

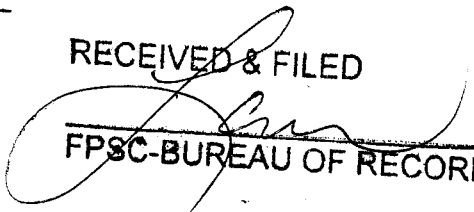
RESPECTFULLY SUBMITTED this 31st day of July 2000.

By: Donna Canzano McNulty

Donna Canzano McNulty
 325 John Knox Road, The Atrium
 Suite 301
 Tallahassee, FL 32314
 (850) 425-2313

ATTORNEY FOR MCI WORLDCOM

- APP _____
- CAF _____
- CMP Barrett
- COM 3
- CTR _____
- ECR _____
- LEG 2
- OPC _____
- PAI _____
- RGO _____
- SEC 1
- SER _____
- OTH _____

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 FPSC-BUREAU OF RECORDS

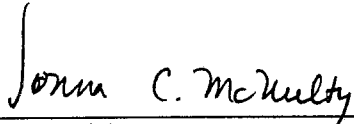
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following by U.S. Mail or Hand Delivery (*) this 31st day of July, 2000:

Patricia Christensen
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Nancy B. White (*)
Michael P. Goggin
c/o Nancy Sims
150 South Monroe Street
Suite 400
Tallahassee, FL 32301-1556



Attorney

ORIGINAL
RECEIVED-FPSC

00 JUL 31 PM 4:40

RECORDS AND
REPORTING

July 31, 2000

BY HAND DELIVERY

Blanca Bayó
Director, Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

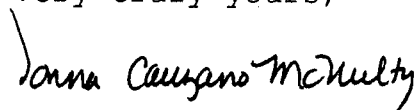
Re: Docket No. 000649-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of MCI metro Access Transmission Services, LLC and MCI WORLD COM Communications, Inc. are the original and fifteen copies of their Notice of Objections to BellSouth's First Request for Production of Documents.

By copies of this letter, this testimony has been furnished to the parties on the attached service list.

Very truly yours,


Donna Canzano McNulty

cc: Parties of Record

143607.2

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of MCImetro Access) Docket No. 000649-TP
Transmission Services, LLC and)
MCI WorldCom Communications, Inc.) Filed: July 31, 2000
For Arbitration of Certain Terms and)
Conditions of Proposed Agreement)
With BellSouth Telecommunications, Inc.)
Concerning Interconnection and Resale)
Under the Telecommunications Act of 1996)
_____)

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

MCImetro Access Transmission Services, LLC and MCI WorldCom Communications, Inc. (collectively "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 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 ten-day objection requirement set forth in Order No. PSC-00-1324-PCO-TP, issued July 21, 2000¹. Should additional grounds for objection be discovered as MCI WorldCom prepares its Answers to the above-referenced discovery request, MCI WorldCom reserves its right to supplement, revise, or modify its objections at the time that it serves its Answers on

¹ The Order Establishing Procedure was issued subsequent to the date MCI WorldCom was served by BellSouth. Accordingly, MCI WorldCom files these objections ten days from the date the Order was issued. MCI WorldCom plans to respond to BellSouth's discovery within the normal time permitted from service.

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 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 MCImetro Access Transmission Services, LLC and MCI WorldCom Communications, Inc.

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

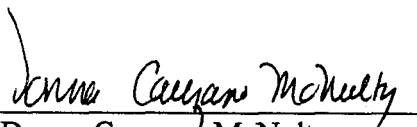
operating subsidiaries certificated in Florida, to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such definition is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. Without waiver of its general objection, and subject to other general and specific objections, Answers will be provided on behalf of MCImetro Access Transmission Services, LLC and MCI WorldCom Communications, Inc.

Specific Objections

REQUEST NO. 8: Produce copies of any state commission decisions in arbitrations involving MCI WorldCom pursuant to Section 252 of the Telecommunications Act of 1996 that addressed any of the issues raised in MCI WorldCom's Petition.

OBJECTION: MCI WorldCom objects to this request for production of documents on the grounds that it is oppressive, unduly burdensome and overly time consuming as written.

Respectfully submitted,



Donna Canzano McNulty
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(850) 422-1254

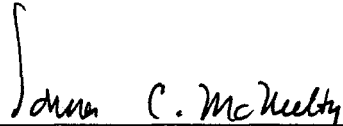
Attorney for MCI WorldCom, Inc.

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Nancy B. White (*)
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150 South Monroe Street
Suite 400
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Attorney