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August 22, 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 its Objections to BellSouth's Second Set of Interrogatories.

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

Very truly yours,

Donna Canzano McNulty
Donna Canzano McNulty

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Petition of MCImetro Access)	Docket No. 000649-TP
Transmission Services, LLC and)	
MCI WorldCom Communications, Inc.)	Filed: August 22, 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)	
_____)	

**WORLDCOM'S OBJECTIONS TO
BELLSOUTH TELECOMMUNICATIONS, INC.'S
SECOND SET OF INTERROGATORIES**

MCImetro Access Transmission Services, LLC and MCI WorldCom Communications, Inc. (collectively "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 BellSouth Telecommunications, Inc,'s (hereinafter "BellSouth") Second Set of Interrogatories.

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, 2000 and Order No. PSC-99-1464-FCO-TP, issued August 14, 2000. Should additional grounds for objection be discovered as WorldCom prepares its Answers to the above-referenced discovery request, WorldCom reserves its right to supplement, revise, or modify its objections at the time that it serves its Answers on BellSouth. Moreover, should WorldCom determine that a Protective Order is necessary with respect to any of the material requested by BellSouth, WorldCom reserves the right to file a motion with the

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Commission seeking such an order at the time that it serves its Answers on BellSouth.

General Objections

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

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

WorldCom objects to the definitions of "MCI WorldCom" 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.

2. Unless otherwise indicated, WorldCom has interpreted BellSouth's interrogatories to apply to 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, WorldCom objects to such interrogatory as irrelevant, overly broad, unduly burdensome, and oppressive.

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

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

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

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

8. 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. 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, 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, WorldCom enters the following specific objections with respect to BellSouth's interrogatories:

INTERROGATORY NO. 62: Please refer to Exhibit 1 to BellSouth's Second Set of Interrogatories, which identifies the wire centers served by BellSouth's tandem switches in Florida. For each wire center identified in Exhibit 1 as being served by BellSouth's tandem switches in Florida, state the number of customers in each such wire center to which MCI WorldCom provides telephone exchange service.

OBJECTION: WorldCom considers this information to be confidential proprietary business information, and WorldCom will respond to BellSouth's request after execution of a nondisclosure agreement. WorldCom also notes that Exhibit 1 appears to have been inadvertently omitted from the discovery request and has notified BellSouth accordingly.

Respectfully submitted,


Donna Canzano McNulty
MCI WorldCom, Inc.
325 John Knox Road, Ste. 105
Tallahassee, FL 32303
(850) 422-1254

Attorney for MCI WorldCom, Inc.

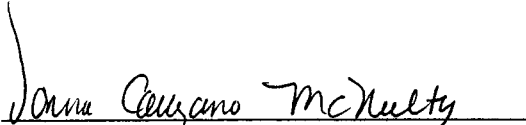
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following by U.S. Mail or Hand Delivery (*) this 22nd day of August, 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

Bennett L. Ross
BellSouth Telecommunications,
Inc.
675 W. Peachtree Street
Suite 4300
Atlanta, GA



Attorney