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COMMISSION
CLERK

February 25, 2002

BY HAND DELIVERY

Ms. Blanca Bayó, Director
The Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 990649B-TP

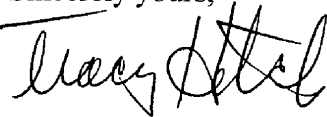
Dear Ms. Bayó:

Enclosed for filing on behalf of AT&T Communications of the Southern States, LLC, MCI WorldCom, Inc, and Florida Digital Network, Inc. are the following documents:

1. An original and fifteen copies the AT&T, MCI, and FDN's Objections to Verizon Florida, Inc.'s Second Set of Interrogatories; and *02212-02*
2. An original and fifteen copies the AT&T, MCI, and FDN's Objections to Verizon Florida, Inc.'s Third Request for Production of Documents. *02211-02*

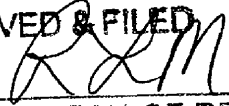
Please acknowledge receipt of this letter by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely yours,

Tracy W. Hatch

- AUS _____
- CAF _____
- CMP _____
- COM _____
- CTR _____
- ECR _____
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- SEC I
- OTH _____

TWH/amb
Enclosures

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FPSC-BUREAU OF RECORDS

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of)
unbundled Network, Inc. elements)
_____)

Docket No. 990649B-TP
Filed: February 25, 2002

**AT&T, MCI AND FDN'S OBJECTIONS TO VERIZON FLORIDA, INC.'S
THIRD REQUEST FOR PRODUCTION OF DOCUMENTS**

AT&T Communications of the Southern States, LLC (hereinafter "AT&T") and MCI WorldCom, Inc. (hereinafter "MCI") and Florida Digital Network, Inc., Inc. (hereinafter "FDN"), pursuant to Rules 25-22.034 and 25-22.035, Florida Administrative Code and Rules 1.350 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following Objections to Verizon's Third Request for Production of Documents to AT&T Communications of the Southern States, LLC, MCI WorldCom, Inc. and Florida Digital Network, Inc.

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-00-0540-PCO-TP issued by the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced docket. Should additional grounds for objection be discovered as AT&T, WorldCom and FDN prepare its Responses to the above-referenced set of requests, AT&T/MCI/FDN reserve the right to supplement, revise, or modify its objections at the time that it serves its Responses on Verizon. Moreover, should AT&T/MCI/FDN determine that a Protective Order is necessary with respect to any of the material requested by

DOCUMENT NUMBER PAGE

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FPSC-COMMISSION CLERK

Verizon, AT&T/MCI/FDN reserve the right to file a motion with the Commission seeking such an order at the time that it serves its Responses on Verizon.

General Objections

AT&T/MCI/FDN make the following General Objections to Verizon's Third Request for Production of Documents which will be incorporated by reference into AT&T, WorldCom and Florida Digital Network, Inc.'s specific responses when its Responses are served on Verizon.

1. AT&T/MCI/FDN object to Verizon's Third Request for Production of Documents to the extent that it is overly broad, unduly burdensome, oppressive, not permitted by applicable discovery rules, and would require AT&T, WorldCom and Florida Digital Network, Inc. to disclose information which is privileged.

2. AT&T/MCI/FDN have interpreted Verizon's requests to apply to AT&T/MCI/FDN'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, AT&T/MCI/FDN object to such request as irrelevant, overly broad, unduly burdensome, and oppressive.

3. AT&T/MCI/FDN object to each and every request and instruction to the extent that such request 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/MCI/FDN object 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 AT&T/MCI/FDN in response to Verizon's requests will be provided subject to, and without waiver of, the foregoing objection.

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

6. AT&T/MCI/FDN object to Verizon's general instructions, definitions or specific discovery requests insofar as they seek to impose obligations on AT&T, WorldCom and Florida Digital Network, Inc. which exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

7. AT&T/MCI/FDN 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/MCI/FDN object to each and every request, general instruction, or definition insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. AT&T/MCI/FDN object 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 Verizon's requests seek proprietary

confidential business information which is not the subject of the "trade secrets" privilege, AT&T/MCI/FDN will make such information available to counsel for Verizon pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

10. AT&T/MCI/FDN are large corporations with employees located in many different locations in Florida and in other states. In the course of its business, AT&T/MCI/FDN create 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 AT&T/MCI/FDN after a reasonable and diligent search conducted in connection with this discovery request. AT&T/MCI/FDN will comply with Verizon'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, AT&T/MCI/FDN object on the grounds that compliance would impose an undue burden or expense.

11. AT&T/MCI/FDN object to the definitions of "AT&T", "MCI" and "FDN" to the extent that such definitions seek to impose an obligation on AT&T Communications of the Southern States, LLC, MCI WorldCom, Inc. and Florida Digital Network, Inc. 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 AT&T Communications of the Southern States, LLC, MCI WorldCom, Inc. and Florida Digital Network, Inc. which is the entity certificated to provide regulated telecommunications services in Florida and which is a party to this docket. All references to "AT&T", "MCI" and "FDN" in responding to Verizon's requests should be taken to mean AT&T Communications of the Southern States, LLC, MCI WorldCom, Inc. and Florida Digital Network, Inc.

12. AT&T/MCI/FDN object to the definitions of "you" and "your" to the extent that such definitions seek to impose an obligation on AT&T Communications of the Southern States, LLC, MCI WorldCom, Inc. and Florida Digital Network, Inc. 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 AT&T Communications of the Southern States, LLC, MCI WorldCom, Inc. and Florida Digital Network, Inc. which is the entity certificated to provide regulated telecommunications services in Florida and which is a party to this docket. All references to "AT&T", "MCI" and "FDN" in responding to Verizon's requests should be taken to mean AT&T Communications of the Southern States, LLC, MCI WorldCom, Inc. and Florida Digital Network, Inc.

SPECIFIC OBJECTIONS

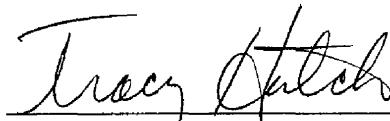
REQUEST NO. 15: For each supplier identified in the ALEC Coalition's response to Verizon's Interrogatory 26, please provide product documentation and/or references to such documentation that describes the product, its functionality and its availability for purchase.

OBJECTION: AT&T, WorldCom, and FDN object to this request for production on the grounds that it is overly broad and unduly burdensome.

REQUEST NO. 16: For each vendor identified in the ALEC Coalition's response to Verizon's Interrogatory 27, please provide product documentation and/or references to such documentation that describes the product, its functionality and its availability for purchase.

OBJECTION: AT&T, WorldCom, and FDN object to this request for production on the grounds that it is overly broad and unduly burdensome.

SUBMITTED this 25th day of February, 2002.



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and

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of AT&T, MCI and FDN's Objections to Verizon Florida, Inc.'s Third Request for Production of Documents in Docket 990649B-TP has been served on the following parties by Hand Delivery (*) and/or U. S. Mail this 25th day of February, 2002.

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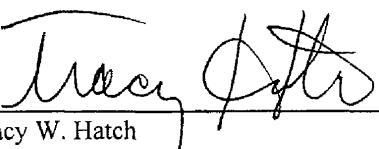
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