

HOPPING GREEN & SAMS
PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS

ORIGINAL

JAMES S. ALVES
BRIAN H. BIBEAU
RICHARD S. BRIGHTMAN
DIANE W. CARR
KEVIN B. COVINGTON
T. SPENCER CROWLEY, III
BRIAN A. CRUMBAKER
PETER C. CUNNINGHAM
RALPH A. DeMEO
WILLIAM H. GREEN
MATTHEW L. HICKS
WADE L. HOPPING
GARY K. HUNTER, JR.
JONATHAN T. JOHNSON
ROBERT A. MANNING
FRANK E. MATTHEWS
RICHARD D. MELSON
KYLE V. MITCHELL

123 SOUTH CALHOUN STREET
POST OFFICE BOX 6526
TALLAHASSEE, FLORIDA 32314
(850) 222-7500
FAX (850) 224-8551
www.hgss.com

ANGELA R. MORRISON
ERIC T. OLSEN
GARY V. PERKO
MICHAEL P. PETROVICH
DAVID L. POWELL
CAROLYN S. RAEPPLE
DOUGLAS S. ROBERTS
D. KENT SAFRIET
GARY P. SAMS
TIMOTHY G. SCHOENWALDER
DAN R. STENGLE
CHERYL G. STUART
JENNIFER A. TSCHETTER
VICTORIA L. WEBER
OF COUNSEL
ELIZABETH C. BOWMAN
REX D. WARE

Writer's Direct Dial No.
(850) 425-2359

August 16, 2002

BY HAND DELIVERY

Blanca Bayó
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Re: Docket 202129-TP

Dear Ms. Bayó:

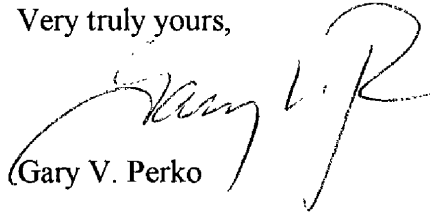
Enclosed for filing on behalf of MCI WorldCom, Inc. are the original and fifteen copies of its Objections to Staff's First Set of Interrogatories and its Objections to Staff's First Request for Production of Documents.

AUG _____
CAF _____
CMI _____
COM _____
CTR _____
EOR _____
GCL _____
OPC _____
MMS _____
SEC _____
OTH _____

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


If you have any questions please feel free to call me at 425-2359.

Very truly yours,


(Gary V. Perko)

GVP/jlm
Enclosures
cc: Certificate of Service

OBJ. to Staff's
1st Request
DOCUMENT NUMBER-DATE
08663 AUG 16 02
FPSC-COMMISSION CLERK

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

OBJ. to 1st Set
of Interrogatories
DOCUMENT NUMBER-DATE
08662 AUG 16 02
FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

Original
+ 15

I HEREBY CERTIFY that a true and correct copy of the 1 U.S. mail and/or hand deliver (*) to all known parties of record in 1 16th day of August, 2002.

Jason Fudge*
FL Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Pennington Law
Karen Camechi
P.O. Box 10095
Tallahassee, FL 32302-2095

BellSouth Telecommunications, Inc.
Ms. Nancy B. White/James Meza III
c/o Ms. Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556

Rutledge Law Firm
Ken Hoffman/J. Ellis/Martin McDonnell
P.O. Box 551
Tallahassee, FL 32302

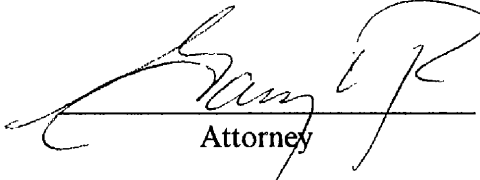
Florida Cable Telecommunications Assoc.,
Inc.
Michael A. Gross
246 E. 6th Avenue, Suite 100
Tallahassee, FL 32303

Time Warner Telecom of Florida, L.P.
Ms. Carolyn Marek
Time Warner Telecom
233 Bramerton Court
Franklin, TN 37069-4002

ITC^DeltaCom
Ms. Nanette S. Edwards
4092 South Memorial Parkway
Huntsville, AL 35802-4343

US LEC of Florida Inc.
Mr. Greg Lunsford
6801 Morrison Blvd.
Charlotte, NC 28211-3599

Donna McNulty
MCI WorldCom, Inc.
325 John Knox Rd., The Atrium
Suite 105
Tallahassee, FL 32303


Attorney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. mail and/or hand deliver (*) to all known parties of record in Docket No. 020129-TP this 16th day of August, 2002.

Jason Fudge*
FL Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Pennington Law Firm
Karen Camechis
P.O. Box 10095
Tallahassee, FL 32302-2095

BellSouth Telecommunications, Inc.
Ms. Nancy B. White/James Meza III
c/o Ms. Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556

Rutledge Law Firm
Ken Hoffman/J. Ellis/Martin McDonnell
P.O. Box 551
Tallahassee, FL 32302

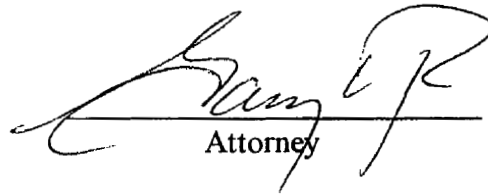
Florida Cable Telecommunications Assoc.,
Inc.
Michael A. Gross
246 E. 6th Avenue, Suite 100
Tallahassee, FL 32303

Time Warner Telecom of Florida, L.P.
Ms. Carolyn Marek
Time Warner Telecom
233 Bramerton Court
Franklin, TN 37069-4002

ITC^DeltaCom
Ms. Nanette S. Edwards
4092 South Memorial Parkway
Huntsville, AL 35802-4343

US LEC of Florida Inc.
Mr. Greg Lunsford
6801 Morrison Blvd.
Charlotte, NC 28211-3599

Donna McNulty
MCI WorldCom, Inc.
325 John Knox Rd., The Atrium
Suite 105
Tallahassee, FL 32303


Attorney

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint petition of US LEC of Florida, Inc.,)
Time Warner Telecom of Florida, L.P., and)
ITC^DeltaCom Communications objecting to)
and requesting suspension of proposed CCS7)
Access Arrangement tariff filed by BellSouth)
Telecommunications, Inc.)
_____)

Docket No. 020129-TP

Filed: August 16, 2002

**WORLDCOM'S OBJECTIONS TO STAFF'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS (NOS. 1 - 4)**

MCI WorldCom Communications, Inc., (hereinafter "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 the Staff of the Florida Public Service Commission's (hereinafter "Staff") First Request for Production of Documents (Nos. 1 – 4) to MCI WorldCom Communications, 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-02-0853-PCO-TP issued by the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced docket on June 21, 2002. Should additional grounds for objection be discovered as WorldCom prepares its Answers to the above-referenced discovery request, WorldCom reserves the right to supplement, revise, or modify its objections at the time that it serves its Answers on Staff.

DOCUMENT NUMBER DATE

08663 AUG 16 2002

FPSC-COMMISSION CLERK

General Objections

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

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

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

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

6. WorldCom objects to Staff'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 request, 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 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 Staff's requests seek proprietary confidential business information which is not the subject of the "trade secrets" privilege, WorldCom will make such information available to counsel for Staff pursuant to an appropriate claim of confidentiality, subject to any other general or specific objections contained herein.

10. WorldCom is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, 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 WorldCom after a reasonable and diligent search conducted in connection with this


discovery request. WorldCom will comply with Staff'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, WorldCom objects on the grounds that compliance would impose an undue burden or expense.

11. 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 its certificated entities in Florida applicable to this proceeding. Without waiver of its general objection, and subject to other general and specific objections, Answers will be provided on behalf of WorldCom Inc.'s certificated entities that provide regulated telecommunications services in Florida and are applicable to this docket.

12. WorldCom objects to the definitions of "you" and "your" to the extent that such definitions seek to impose an obligation on 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 WorldCom, Inc. operating

subsidiaries that are certificated to provide regulated telecommunications services in Florida.

Respectfully submitted,



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

and

Dulaney L. O'Roark III
WorldCom, Inc.
Six Concourse Parkway
Suite 3200
Atlanta, GA 30328
(770) 284-5498

Attorneys for WorldCom, Inc.