

# Hopping Green & Sams

Attorneys and Counselors

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May 19, 2003

## BY HAND DELIVERY

Blanca Bayó  
Director, Office of the Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Docket No. 020507-TL


Dear Ms. Bayó:

Enclosed for filing on behalf of MCI WorldCom Communications, Inc. and MCImetro Access Transmission Services LLC are the original and fifteen copies of MCI's Preliminary Objections to BellSouth's 1st Set of Interrogatories.

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

Please stamp and return the enclosed extra copy of this filing. If you have any questions regarding this filing, please give me a call at 425-2313.

Very truly yours,



Richard D. Melson

RDM/mee  
Enclosures  
cc: Certificate of Service

DOCUMENT NUMBER DATE

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FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint of AT&T Communications )  
of the Southern States, LLC; MCI WorldCom )  
Communications, Inc. and MCImetro Access ) Docket No. 020507-TL  
Transmission Services, LLC; and Access )  
Integrated Networks, Inc. against BellSouth ) Filed: May 19, 2003  
Telecommunications, Inc. and Request for )  
Expedited Relief )  
\_\_\_\_\_ )

**MCI'S OBJECTIONS TO  
BELLSOUTH FIRST SET OF INTERROGATORIES**

MCI WorldCom Communications, Inc. and MCImetro Access Transmission Services, LLC ("MCI"), pursuant to Rules 28-106.206, Florida Administrative Code and Rules 1.340, 1.350 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following objections to BellSouth Telecommunications Inc.'s ("BellSouth's") First Set of Interrogatories MCI.

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-02-1537-PCO-TL, issued November 12, 2002. Should additional grounds for objection be discovered as MCI prepares its answers to the above-referenced discovery requests, MCI reserves its right to supplement, revise, or modify its objections at the time that it serves its responses on BellSouth. Moreover, should MCI determine that a Protective Order is necessary with respect to any of the material requested by BellSouth, MCI reserves the right to file a motion with the Commission seeking such an order at the time that it serves its responses on BellSouth.

## General Objections

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

1. MCI objects to each and every request and instruction to the extent that they are overly broad, unduly burdensome, oppressive, not permitted by applicable discovery rules, or would require MCI to disclose information which is privileged.

2. MCI objects to each and every request and instruction to the extent that they would require MCI to provide information about operations in states other than Florida, on the grounds that such requests are irrelevant, overly broad, unduly burdensome, and oppressive.

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

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

6. MCI objects to each and every request and instruction insofar as they seek to impose obligations on MCI which exceed the requirements of the Florida Rules of Civil

Procedure or Florida law, including a requirement to supplement any response that was complete and correct when initially furnished.

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

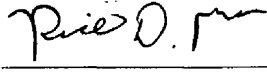
8. MCI objects to each and every request to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes.

9. MCI is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, MCI 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. MCI's responses will provide all of the information obtained by MCI after a reasonable and diligent search conducted in connection with these discovery requests. MCI will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the discovery requests purport to require more, MCI objects on the grounds that compliance would impose an undue burden or expense.

10. MCI objects to the definitions of "you" and "your" 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 definitions are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

RESPECTFULLY SUBMITTED this 19th day of May, 2003.

HOPPING GREEN & SAMS

By: 

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ATTORNEYS FOR MCI

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was served by E-mail and U.S. Mail

on the following this 19th day of May, 2003:

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