

Hopping Green & Sams

Attorneys and Counselors

Writer's Direct Dial Number
(850) 425-2313

May 27, 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 Staff'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

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 27, 2003
Telecommunications, Inc. and Request for)	
Expedited Relief)	
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**MCI'S PRELIMINARY OBJECTIONS TO
STAFF'S 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 submit the following objections to Staff's First Set of Interrogatories to 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 Staff. Moreover, should MCI determine that a Protective Order is necessary with respect to any of the material requested by Staff, MCI reserves the right to file a motion with the Commission seeking such an order at the time that it serves its responses on Staff.

General Objections

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

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 Staff'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 "MCI," "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 27th day of May, 2003.

HOPPING GREEN & SAMS

By: 

Richard D. Melson
P.O. Box 6526
Tallahassee, FL 32301
(850) 425-2313
rmelson@hgslaw.com

and

DONNA McNULTY
WorldCom, Inc.
1203 Governors Square Boulevard, Suite 201
Tallahassee, FL 32301
(850) 219-1008
donna.mculty@mci.com

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 27th day of May, 2003:

Patricia Christensen
Staff Attorney
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399
pchriste@psc.state.fl.us

AT&T Communications
of the Southern States, LLC
Virginia Tate
1200 Peachtree Street, N.E., Ste. 8100
Atlanta, GA 30309-3579
virginia.tate@att.com

AT&T Communications
of the Southern States, LLC
Tracy Hatch
101 North Monroe Street, Suite 700
Tallahassee, FL 32301
tracy.hatch@att.com

Nancy B. White
James Meza III
BellSouth Telecommunications, Inc.
c/o Nancy H. Sims
150 South Monroe Street
Suite 400
Tallahassee, FL 32301
nancy.white@bellsouth.com
james.meza@bellsouth.com
nancy.sims@bellsouth.com

R. Douglas Lackey
Meredith E. Mays
BellSouth Telecommunications, Inc.
Suite 4300, BellSouth Center
675 West Peachtree Street, N.E.
Atlanta, GA 30375
douglas.lackey@bellsouth.com
meredith.mays@bellsouth.com

Dulaney L. O'Roark III
WorldCom, Inc.
Six Concourse Parkway, Suite 3200
Atlanta, GA 30328
de.oroark@mci.com

Donna C. McNulty
WorldCom, Inc.
1203 Governors Square Blvd., Suite 201
Tallahassee, FL 32301
donna.mcnulty@mci.com

McWhirter Law Firm
Vicki Kaufman
Joseph A. McGlothlin
117 S. Gadsden St.
Tallahassee, FL 32301
vkaufman@mac-law.com
jmgllothlin@mac-law-com

ITC^DeltaCom
Ms. Nanette Edwards
4092 S. Memorial Parkway
Huntsville, AL 35802-4343
nedwards@itcdeltacom.com

Messer Law Firm
Floyd R. Self
P.O. Box 1876
Tallahassee, FL 32302-1876
fself@lawfl.com



Attorney