

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of LDDS WorldCom's Responses and Objections to BellSouth's First Set of Interrogatories and LDDS WorldCom's Responses and Objections to BellSouth's First Request for Production of Documents in Docket No. 950984-TP has been furnished by Hand Delivery (*) and/or U. S. Mail on this 4th day of January, 1996 to the following parties of record:

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL
FILE COPY

In re: Resolution of petition(s))
to establish unbundled services,)
network features, functions or) Docket 950984-TP
capabilities, and local loops) Filed: January 4, 1996
pursuant to Section 364.161,)
Florida Statutes)
_____)

WORLDCOM, INC. d/b/a LDDS WORLDCOM COMMUNICATIONS'
RESPONSES AND OBJECTIONS TO BELL SOUTH
TELECOMMUNICATIONS, INC.'S
FIRST SET OF INTERROGATORIES

WorldCom, Inc. d/b/a LDDS WorldCom Communications ("LDDS WorldCom"), pursuant to Rules 25-22.034 and 25-22.035, Florida Administrative Code, and Rules 1.280 and 1.340, Florida Rules of Civil Procedure, hereby submits the following Responses and Objections to the First Set of Interrogatories from BellSouth Telecommunications, Inc. ("BellSouth").

GENERAL OBJECTIONS

LDDS WorldCom makes the following General Objections to BellSouth's First Set of Interrogatories which are also incorporated by reference into specific responses.

1. LDDS WorldCom objects to any interrogatory that is intended to apply to matters other than operations in Florida on the basis that such interrogatory is irrelevant, overly broad, unduly burdensome, and oppressive.

2. LDDS WorldCom objects to each interrogatory insofar as

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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.

3. LDDS WorldCom objects to each 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.

4. LDDS WorldCom objects to each discovery request insofar as each seeks to impose obligations which exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

5. LDDS WorldCom objects to each and every interrogatory, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

SPECIFIC OBJECTIONS

1. **Has LDDS WorldCom been a party to any unbundling/resale dockets in states other than Florida?**

Response: LDDS WorldCom objects to this interrogatory on the basis that the request relates to operations in jurisdictions other than Florida and that it is, overly broad and unduly burdensome. Further the interrogatory does not relate to any issue in this docket and is not reasonably

calculated to lead to the discovery of admissible evidence.

2. If the answer to Interrogatory No. 1 is affirmative, provide the following information:

- (a) the name(s) of the state(s) or jurisdictions in which LDDS WorldCom appeared as a party in such dockets;
- (b) the official name of the proceeding, including any docket numbers or other information necessary to fully describe the docket;
- (c) the date any order was rendered in such docket;
- (d) if an order was rendered, state whether it was for an interim/temporary or permanent resolution of the issues addressed therein;
- (e) if an order was rendered, when was it implemented, or if not yet implemented, state when it is to be implemented;
- (f) state the financial arrangements ordered;
- (g) state the technical arrangements ordered;
- (h) describe each network element, function, or capability ordered to be unbundled and the rate for each such element function, or capability, if not provided in response to an earlier interrogatory;
- (i) state whether the local exchange company was ordered to

directly connect the entities (i.e. alternative local exchange companies) collocated in the local exchange company's office, with each other as opposed to connecting through the local exchange company's facilities;

- (j) state the total number of access lines in the state;
- (k) state whether the order identified above, if any, has been the subject of a judicial appeal and, if so, the identity of the court, the case number, the current status of the appeal, and the basis of the appeal;
- (l) identify any person who either prepared testimony, prepared and filed testimony, or who gave testimony on LDDS WorldCom's behalf in the proceedings referred to in response to this interrogatory;
- (m) describe, by title or content, or alternatively by date and jurisdiction, the testimony, if written, given in the dockets identified in this interrogatory by these persons identified in (l) above.

Response: LDDS WorldCom objects to this interrogatory on the basis that the request relates to operations in jurisdictions other than Florida and are irrelevant, overly broad and unduly burdensome. To the extent that BellSouth was a

party to any dockets or negotiations and to the extent this is public information, such information is readily available to BellSouth. Further the interrogatory does not relate to any issue in this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

3. **Has LDDS WorldCom reached an agreement, either oral or in writing, concerning unbundling/resale with any local exchange companies in states other than Florida, whether in a formal docketed matter or otherwise?**

Response: LDDS WorldCom objects to this interrogatory on the basis that the request relates to operations in jurisdictions other than Florida and are irrelevant, overly broad and unduly burdensome. To the extent that BellSouth was a party to any dockets or negotiations and to the extent this is public information, such information is readily available. Further the interrogatory does not relate to any issue in this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

4. **If your response to Interrogatory Nos. 3 is affirmative, provide the following information:**
- (a) **the identity of the parties to such an agreement;**

- (b) the date such an agreement was signed, or otherwise became effective;
- (c) the date such agreement is to be implemented, or if already implemented, the date of implementation;
- (d) a summary of the terms and conditions of such agreement, including the rates for any unbundled offerings or for any services to be resold;
- (e) a listing of each network function, element or capability to be unbundled and the rate therefore, if not previously provided;
- (f) if reduced to writing, identify the agreement by either a description or title in sufficient detail such that the document can be requested for production;

Response: LDDS WorldCom objects to this interrogatory on the basis that the request relates to operations in jurisdictions other than Florida and are irrelevant, overly broad and unduly burdensome. To the extent that BellSouth was a party to any dockets or negotiations and to the extent this is public information, such information is readily available to BellSouth. Further the interrogatory does not relate to any issue in this docket and is not reasonably calculated to lead to the discovery of

admissible evidence.

5. **Has LDDS WorldCom agreed to or been directed to offer for resale or unbundling, any of its own facilities to third parties for any purpose, including the offering of competitive services.**

Response: LDDS WorldCom objects to this interrogatory on the basis that the request relates to operations in jurisdictions other than Florida and that it is irrelevant, overly broad and unduly burdensome. Further, the interrogatory does not relate to any issue in this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

6. **If the answer to Interrogatory No. 5 is affirmative, and the agreement or order was reduced to writing, please describe such agreements or orders with enough detail so that the writing can be requested for production.**

Response: LDDS WorldCom objects to this interrogatory on the basis that the request relates to operations in jurisdictions other than Florida and that it is irrelevant, overly broad and unduly burdensome. Further the interrogatory does not relate to any issue in this docket and is not reasonably calculated to lead to the discovery of

admissible evidence.

7. Does LDDS WorldCom have any internal policy or position concerning the resale or unbundling of its own facilities?

Response: LDDS WorldCom objects to this interrogatory on the basis that the request is vague, overly broad, unduly burdensome, not relevant to the subject matter of this case, and not reasonably calculated to lead to discovery of admissible evidence.

8. If the answer to Interrogatory No. 7 is affirmative, please describe such policy or position in detail and, if such policy or position is reduced to writing, please describe the written document with sufficient detail to allow it to be requested for production.

Response: LDDS WorldCom objects to this interrogatory on the basis that the request is vague, overly broad, unduly burdensome, not relevant to the subject matter of this case, and not reasonably calculated to lead to discovery of admissible evidence.

9. If not provided in response to an earlier interrogatory, please identify every jurisdiction where:

(a) LDDS WorldCom is authorized to provide local exchange services;

- (b) whether, in such jurisdictions, LDDS WorldCom provides service over its own facilities or by using resold or unbundled facilities or by using some combination of its own and resold or unbundled facilities;
- (c) identify in detail, including rates paid, the types or kind of unbundled facilities, or resold services that LDDS WorldCom uses, in each jurisdiction, i.e. resold residential services, unbundled local loops, etc.

Response: LDDS WorldCom objects to this interrogatory on the basis that the request relates to operations in jurisdictions other than Florida and that it is irrelevant, overly broad and unduly burdensome. Further the interrogatory does not relate to any issue in this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

10. If LDDS WorldCom uses resold tariffed services in the jurisdictions where it provides local service, does it receive a discount from the provider of the resold service?

Response: LDDS WorldCom objects to this interrogatory on the basis that the request relates to operations in jurisdictions other than Florida and that it is irrelevant, overly broad and unduly burdensome. Further the interrogatory

does not relate to any issue in this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

11. If the answer to Interrogatory No. 10 is affirmative, for each type or kind of service resold, please:

(a) state the basis for the discount;

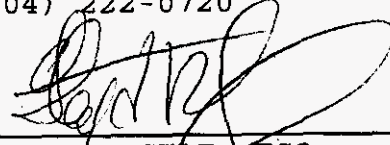
(b) state whether the discount allows the resale of the service on a profitable basis.

Response: LDDS WorldCom objects to this interrogatory on the basis that the request relates to operations in jurisdictions other than Florida and that it is irrelevant, overly broad and unduly burdensome. Further the interrogatory does not relate to any issue in this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

Respectfully submitted this 4th day of January, 1996.

Respectfully submitted,

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