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September 30, 1996



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OF COUNSEL W. ROBERT FOKES

Ms. Blanca S. Bayó Director, Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

> Re: MCI/GTEFL Arbitration Docket No. 960980-TP

Dear Ms. Bayó:

ACK _____ AFA

> RDM/mme Enclosures

CTR _____ Parties of Record

APD

EMG

WAS ____

Enclosed for filing on behalf of MCI Telecommunications Corporation and MCI Metro Access Transmission Services, Inc. (MCI) are the original and 15 copies of:

MCI's Objections to GTEFL's 1st Set of Interrogatories. 1.

2. MCI's Objections to GTEFL's 1st Request for Production of Documents.

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

Very truly yours,

Richard D. Melson

T NUMBER-DATE 10456 SEP 30 % OTH _____ FPSC-RECORDS/REPORTING

DOCUMENT NUMBER-DATE

10457 SEP 30 H FPSC-RECORDS/REPORTING



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by MCI Telecommunications Corporation and MCImetro Access Transmission Services, Inc. for arbitration of certain terms and conditions of a proposed agreement with GTE Florida Incorporated concerning interconnection and resale under the Telecommunications Act of 1996

See

Docket No. 960980-TP

Filed: September 30, 1996

OBJECTIONS OF MCI TO GTE FLORIDA INCORPORATED'S FIRST SET OF INTERROGATORIES

MCI Telecommunications Corporation and MCImetro Access Transmission Services, Inc. ("MCI"), 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 submit the following Objections to GTE Florida Incorporated's ("GTE") 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 requirement set forth in the procedural schedule previously issued in this docket. Should additional grounds for objection be discovered as MCI prepares its Answers to the above-referenced set of interrogatories, MCI reserves the right to supplement, revise, or modify its objections at the time that it serves its answers on GTe. Moreover, should MCI determine that a Protective Order is necessary with respect to any of the material requested by GTE, reserves the right to file a motion with the Commission seeking

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such an order at the time it serves its Answers on BellSouth.

<u>Objection to Interrogatories No. 1, 2, 8, 14, 15, 20, 22, 23, 26, 27, 28, 36, and 46</u>:

MCI objects to these interrogatories on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, each request is overly broad, unduly burdensome, oppressive, and seeks information that is subject to the trade secrets privilege and that is beyond the scope of this proceeding.

Objection to Interrogatories No. 3, 4, 7, 10, 11, 12, 16, 17, 30, 31, 33, 34, 37, 38, 40, 41, 42, 43, 45, and 47:

MCI objects to these interrogatories on the grounds that the information requested is irrelevant, overly broad, unduly burdensome, oppressive, and not reasonably calculated to lead to the discovery of admissible evidence.

FILED this 30th day of September, 1996.

HOPPING GREEN SAMS & SMITH, P.A.

By: Pie D. Mese

Richard D. Melson P.O. Box 6526 Tallahassee, Florida 32314 (904) 425-2313

and

MARTHA MCMILLIN MCI Telecommunications Corp. Suite 700 780 Johnson Ferry Road Atlanta, Georgia 30342

ATTORNEYS FOR MCI TELECOMMUNICATIONS CORPORATION

83433.1

• . .

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by hand delivery this 30th day of September, 1996.

Donna Canzano Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399

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Kimberly Caswell c/o Richard Fletcher GTE Florida, Inc. 106 E. College Avenue, #1440 Tallahassee, FL 32301-7704

Tracy Hatch AT&T 101 N. Monroe St., Suite 700 Tallahassee, FL 32301

and by UPS Delivery to:

Kimberly Caswell GTE Florida, Inc. One Tampa City Center Tampa, FL 33601

Robin D. Dunson AT&T Room 4038 1200 Peachtree St. NE Atlanta, GA 30309

Les D. 1

Attorney

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