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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.

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

AUG  
CAF  
CMP  
COM  
CTR  
ECR  
GCL  
OPC  
MMS  
SEC  
OTH

GVP/jlm  
Enclosures  
cc: Certificate of Service

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FPSC-BUREAU OF RECORDS

OBJ. to 1st Set  
of Interrogatories  
DOCUMENT NUMBER-DATE  
08662 AUG 16 2002  
FPSC-COMMISSION CLERK

OBJ. to Staff's  
1st Request  
DOCUMENT NUMBER-DATE  
08663 AUG 16 2002  
FPSC-COMMISSION CLERK

**ORIGINAL**

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VICTORIA L. WEBER  
OF COUNSEL  
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REX D. WARE

CERTIFICATE OF SERVICE

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.

Original  
+  
15

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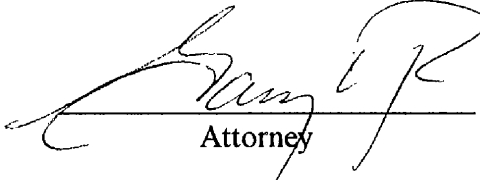
Florida Cable Telecommunications Assoc.,  
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Attorney

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.

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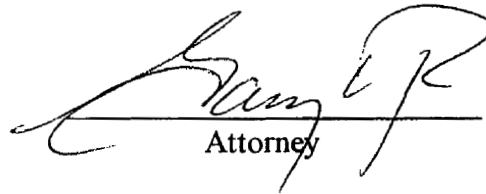
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Attorney

**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 SET OF  
INTERROGATORIES (NOS. 1 - 7)**

WorldCom, Inc., on behalf of MCI WorldCom Communications, Inc. and its other operating subsidiaries (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 Set of Interrogatories (Nos. 1-7) 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 set of interrogatories, WorldCom reserves the right to supplement, revise, or modify its objections at the time that it serves its Answers on Staff.**

DOCUMENT NUMBER-DATE

08662 AUG 16 2002

FPSC-COMMISSION CLERK

### General Objections

WorldCom makes the following General Objections to Staff's First Set of Interrogatories which will be incorporated by reference into WorldCom's specific responses when its Answers are served on Staff.

1. WorldCom objects to the following provisions of the "Definitions" section of Staff's First Set of Interrogatories:

WorldCom objects to the definitions of "MCI WorldCom Communications" 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.

2. Unless otherwise indicated, WorldCom has interpreted Staff's interrogatories to apply to WorldCom's regulated intrastate operations in Florida and will limit its Answers accordingly. To the extent that any interrogatory is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission, WorldCom objects to such interrogatory as irrelevant, overly broad, unduly burdensome, and oppressive.

3. WorldCom objects to each and every interrogatory and instruction to the extent that such interrogatory or instruction calls for information which 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 interrogatory 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 interrogatories. Any Answers provided by WorldCom in response to Staff's interrogatories will be provided subject to, and without waiver of, the foregoing objection.

5. WorldCom objects to each and every 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. 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 that exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

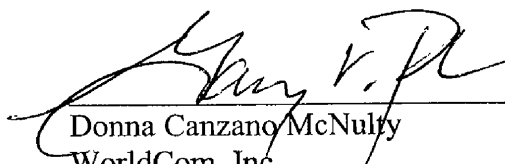
7. WorldCom objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

8. WorldCom objects to each and every interrogatory, 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 interrogatory 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 interrogatories request proprietary

confidential business information that is not subject to 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.

Respectfully submitted,



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and

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Attorneys for WorldCom, Inc.