

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth	)	
Telecommunications, Inc.'s entry into	)	
InterLATA services pursuant to Section	)	Docket No. 960786-TL
271 of the Federal Telecommunications	)	Filed: November 15, 1996
Act of 1996.	)	
_____	)	

**WORLDCOM, INC. D/B/A LDDS WORLDCOM COMMUNICATIONS'  
OBJECTIONS TO BELL SOUTH TELECOMMUNICATIONS INC.'S  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

COMES NOW, WorldCom, Inc. d/b/a LDDS WorldCom Communications ("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 BellSouth Telecommunications Inc.'s ("BellSouth") First Request for Production of Documents.

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-96-0945-PCO-TL issued by the Florida Public Service Commission ("hereinafter the "Commission") in the above-referenced docket on July 19, 1996. Should additional grounds for objection be discovered as

ACK _____	WorldCom prepares its Answers to the above-referenced request for production, WorldCom reserves
AFA _____	the right to supplement, revise, or modify its objections at the time that it serves its Answers on
APP _____	
CAI _____	BellSouth.
CMU _____	

**GENERAL OBJECTIONS**

EAG _____	WorldCom makes the following General Objections to BellSouth's First Request for
LEG _____	
LIN _____	Production of Documents which will be incorporated by reference into WorldCom's specific
OPC _____	responses when its Answers are served on BellSouth.
RCH _____	

SEC _____
WAS _____
CTH _____

DOCUMENT NUMBER-DATE  
**12185 NOV 15 96**  
 FPSC-RECORDS/REPORTING

1. WorldCom objects to the requests to the extent that such requests seek to impose an obligation on WorldCom to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such requests are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. WorldCom has interpreted BellSouth's requests to apply to WorldCom's regulated intrastate operations in Florida and will limit its Answers accordingly. To the extent that any request is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the commission, WorldCom objects to such request as irrelevant, overly broad, unduly burdensome, and oppressive.

3. WorldCom objects to each and every request and instruction to the extent that such request 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 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 Answers provided by WorldCom in response to BellSouth's request will be provided subject to, and without waiver of, the foregoing objection.

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

6. WorldCom objects to BellSouth's discovery requests, instructions and definitions, insofar as they seek to impose obligations on WorldCom which 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 request, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. BellSouth 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. To the extent that BellSouth requests proprietary confidential business information which is not subject to the "trade secrets" privilege, WorldCom will make such information available to counsel for BellSouth pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

#### **OBJECTIONS TO SPECIFIC INTERROGATORIES**

Subject to, and without waiver of, the foregoing general objections, WorldCom enters the following specific objections with respect to BellSouth's requests:

10. Pursuant to the General Objections stated above, WorldCom objects to BellSouth's Request for Production of Documents Item 1 on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence related to the issue of whether BellSouth has met or will be able to meet the requirements of Section 271 of the Telecommunications Act of 1996. Moreover, WorldCom has not sought interconnection with

BellSouth, thus information regarding WorldCom's network facilities is irrelevant. Furthermore, the information requested is subject to the trade secret privilege.

11. Pursuant to the General Objections stated above, WorldCom objects to Item 2 on the grounds that it is overly broad, unduly burdensome, oppressive, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence related to the issue of whether BellSouth has met or will be able to meet the requirements of Section 271 of the Telecommunications Act of 1996. Moreover, it seeks information which is subject to the attorney/client, work product and trade secret privileges.

12. Pursuant to the General Objections stated above, WorldCom objects to Item 3 on the grounds that it is neither relevant nor reasonably calculated to lead to discovery of admissible evidence related to the issue of whether BellSouth has met or will be able to meet the requirements of Section 271 of the Telecommunications Act of 1996. Moreover, the request is unduly burdensome, oppressive and seeks information that is subject to the attorney/client and work product privilege and that is beyond the scope of this proceeding trade secret.

13. Pursuant to the General Objections stated above, WorldCom objects to Items 4, 5, 6, 7, 8, 9 and 11 on the grounds that the information sought is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence related to the issue of whether BellSouth has met or will be able to meet the requirements of Section 271 of the Telecommunications Act of 1996. Moreover the requests are unduly burdensome, oppressive and seeks information that is subject to the attorney/client, work product privilege, and trade secrets privileges.

14. Pursuant to the General Objections stated above, WorldCom objects to Item 10 on the grounds that the information sought is overly broad, unduly burdensome, and oppressive. Moreover, the information sought is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence related to the issue whether BellSouth has met or will be able to meet the requirements of Section 271 of the Telecommunications Act of 1996.

15. Pursuant to the General Objections stated above, WorldCom objects to Item 12 on the grounds that the request seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence related to the issue of whether BellSouth has met or will be able to meet the requirements of Section 271 of the Telecommunications Act of 1996. Moreover, the information sought is subject to the trade secret privilege and beyond the scope of this proceeding.

16. Pursuant to the General Objections stated above, WorldCom objects to Items 13, 14, 15, and 16 on the grounds that these requests seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence related to the issue of whether BellSouth has met or will be able to meet the requirements of Section 271 of the Telecommunications Act of 1996. Moreover, the requests are overly broad, unduly burdensome, oppressive and seeks information that is subject to the attorney/client, work product, and trade secret privileges.

17. Pursuant to the General Objections stated above, WorldCom objects to Item 16 on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence related to the issue of whether BellSouth has met or will be able

to meet the requirements of Section 271 of the Telecommunications Act of 1996. Moreover the request seeks information that is subject to the trade secret privilege.

18. Pursuant to the General Objections stated above, WorldCom objects to Item 17 on the ground that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence related to the issue of whether BellSouth has met or will be able to meet the requirements of Section 271 of the Telecommunications Act of 1996. Moreover, WorldCom has not sought interconnection and therefore any information regarding its network facilities is irrelevant.

19. Pursuant to the General Objections stated above, WorldCom objects to Items 18 and 19 on the grounds that the information sought is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence related to the issue of whether BellSouth has met or will be able to meet the requirements of Section 271 of the Telecommunications Act of 1996. Moreover, the requests seek information that is overly broad, unduly burdensome and oppressive and seeks information that is subject to the trade secret privilege.

20. Pursuant to the General Objections stated above, WorldCom objects to Items 20, 21 and 23 on the grounds that they seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence related to the issue of whether BellSouth has met or will be able to meet the requirements of Section 271 of the Telecommunications Act of 1996. Moreover, WorldCom has not sought interconnection and therefore any information regarding its network facilities is irrelevant. In addition, the requests seek information that is subject to the attorney\client, work product and trade secret privileges.

21. Pursuant to the General Objections stated above, WorldCom objects to Item 22 on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence related to the issue of whether BellSouth has met or will be able to meet the requirements of Section 271 of the Telecommunications Act of 1996.

22. Pursuant to the General Objections stated above, WorldCom objects to Item 24 on the grounds that it seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence related to the issue of whether BellSouth has met or will be able to meet the requirements of Section 271 of the Telecommunications Act of 1996.

23. Pursuant to the General Objections stated above, WorldCom objects to Items 25 and 26 on the grounds that they seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence related to the issue of whether BellSouth has met or will be able to meet the requirements of Section 271 of the Telecommunications Act of 1996. Moreover, the requests are overly broad, speculative and ambiguous and therefore burdensome and oppressive.

24. Pursuant to the General Objections stated above, WorldCom objects to Item 27 on the grounds that the request seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence related to the issue of whether BellSouth has met or will be able to meet the requirements of Section 271 of the Telecommunications Act of 1996. Moreover, WorldCom has not sought interconnection and therefore any information regarding its network facilities is irrelevant.

25. Pursuant to the General Objections stated above, WorldCom objects to Items 28 and 29 on the grounds that they seek information that is neither relevant nor reasonably calculated to lead

to the discovery of admissible evidence related to the issue of whether BellSouth has met or will be able to meet the requirements of Section 271 of the Telecommunications Act of 1996. Moreover, the requests are speculative, vague and overly broad and therefore is burdensome and oppressive.

26. Pursuant to the General Objections stated above, WorldCom objects to Item 30 on the grounds that the request is overly broad, burdensome and oppressive.

Respectfully submitted,  
MESSER, CAPARELLO, MADSEN,  
GOLDMAN & METZ, P.A.  
P. O. Box 1876  
Tallahassee, Florida 32302  
(904) 222-0720



FLOYD R. SELF, ESQ.  
NORMAN H. HORTON, JR., ESQ.  
GWEN G. JACOBS, ESQ.

Attorneys for WorldCom, Inc. d/b/a LDDS WorldCom  
Communications



## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of WorldCom, Inc. d/b/a LDDS WorldCom Communications' Objections to BellSouth Telecommunications, Inc.'s First Request for Production of Documents in Docket No. 960786-TL have been served upon the following parties by Hand Delivery (\*) and/or Overnight Delivery (\*\*) this 15th day of November, 1996:

Monica Barone, Esq.\*  
Division of Legal Services, Room 370  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Ms. Nancy White\*  
c/o Ms. Nancy Sims  
BellSouth Telecommunications, Inc.  
150 S. Monroe Street, Suite 400  
Tallahassee, FL 32301

Joseph A. McGlothlin, Esq.\*  
Vicki Gordon Kaufman, Esq.  
McWhirter, Reeves, McGlothlin,  
Davidson, Rief & Bakas, P.A.  
117 South Gadsden St.  
Tallahassee, FL 32301

Patrick K. Wiggins, Esq.\*  
Wiggins & Villacorta, P. A.  
501 E. Tennessee St.  
Tallahassee, Florida 32302

Patricia Kurlin, Esq.\*\*  
Intermedia Communications, Inc.  
3625 Queen Palm Drive  
Tampa, FL 33169-1309

Richard D. Melson\*  
Hopping Green Sams & Smith  
123 S. Calhoun St.  
Tallahassee, FL 32301

Martha McMillin\*\*  
MCI Telecommunications  
780 Johnson Ferry Road, Suite 700  
Atlanta, GA 30342

Tracy Hatch, Esq\*  
AT&T  
101 N. Monroe St., Suite 700  
Tallahassee, Florida 32301

Robin D. Dunson, Esq.\*\*  
1200 Peachtree St., NE  
Promenade I, Room 4038  
Atlanta, Georgia 30309

Mr. Andrew O. Isar\*\*  
Director- Industry Relations  
Telecommunications Resellers  
Association  
4312 92nd Avenue, NW  
Gig Harbor, WA 98335

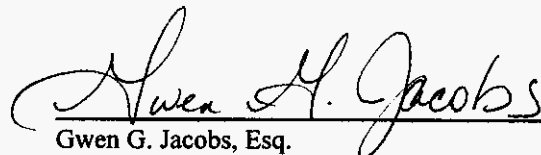
Mr. Jeffrey J. Walker\*\*  
Regulatory Counsel  
Preferred Carrier Services, Inc.  
1425 Greenway Drive, Suite 210  
Irving, TX 75038

Benjamin Fincher, Esq.\*\*  
Sprint Communications Co., L.P.  
3100 Cumberland Circle  
Atlanta, GA 30339

C. Everett Boyd, Jr.\*  
Ervin, Varn, Jacobs, Odom & Ervin  
305 S. Gadsden St.  
Tallahassee, FL 32301

Timothy Devine\*\*  
MFS Communication Company, Inc.  
6 Concourse Parkway, Suite 2100  
Atlanta, GA 30328

Richard M. Rindler\*\*  
Swidler & Berlin, Chartered  
3000 K Street, N.W., Suite 300  
Washington, DC 20007

  
Gwen G. Jacobs, Esq.