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September 27, 1996

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

960833-TP

Re: Docket Nos. 960846-TP, ~~960833~~, 960916

Dear Ms. Bayó:

Enclosed for filing on behalf of MCI Telecommunications Corporation in the above docket are the original and 15 copies of MCI's Objections to BellSouth's First Set of Interrogatories and First Request for Production of Documents.

By copy of this letter, this document has been provided to the parties on the attached service list.

Very truly yours,

Richard D. Melson

ACK

AFA RDM/cc

APP Enclosures

CAF cc: Parties of Record

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by MCI for)	
arbitration of certain terms)	Docket No. 960846-TP
and conditions of a proposed)	
agreement with BellSouth)	
Telecommunications, Inc.)	
concerning interconnection and)	
resale under the)	Served: September 27, 1996
Telecommunications Act of 1996)	
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MCI TELECOMMUNICATIONS CORPORATION'S OBJECTIONS TO BELLSOUTH TELECOMMUNICATIONS, INC.'S FIRST SET OF INTERROGATORIES

MCI Telecommunications Corporation and MCImetro ("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 submits the following Objections to BellSouth Telecommunications, Inc.'s ("BellSouth") 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 Order No. PSC-96-0933-PCO-TP issued by the Florida Public Service Commission ("the Commission") in the above-referenced docket on July 17, 1996. Should additional grounds for objection be discovered as MCI prepare 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 BellSouth. Moreover, should MCI determine that a Protective Order is necessary with respect to any of the material requested by BellSouth, MCI reserves the right to file a motion with the Commission seeking such an order at the time it serves its Answers on BellSouth.

Interrogatory No. 1. Please identify all estimates of demand with regard to BellSouth services that MCI intends to resell in Florida, by service. Provide this information broken down by the estimated number of residence and business access lines, number of accounts, and the estimated average revenue per account and service. If the information requested is not available in this format, then provide the information in whatever format is available.

MCI objection: MCI objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, oppressive, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, it seeks information which is subject to the attorney/client, work product and trade secrets privileges. The scope of this proceeding is to determine the obligations of BellSouth pursuant to the Telecommunications Act of 1996. MCI's plans to enter the local exchange market and any information related thereto are not within the scope of this proceeding.

Interrogatory No. 2. Please provide the results of MCI's marketing of resold services in all areas where MCI is reselling local exchange service. This should include, for each jurisdiction, the type and number of accounts (residence or business), and the average revenue per account. Also, please identify any market share studies performed by MCI or on MCI's behalf.

MCI objection: MCI objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, oppressive, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, it seeks information which is subject to the attorney/client, work product and trade secrets privileges. The scope of this proceeding is to determine the obligations of BellSouth pursuant to the Telecommunications Act of 1996. MCI's plans to enter the local exchange market and any information related thereto are not within the scope of this proceeding.

Interrogatory No. 3. Please provide a list of any and all of MCI's services that have both a retail and a wholesale rate. Describe and identify those rates which are considered by MCI to be wholesale rates.

MCI objection: MCI objects to this interrogatory 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.

Interrogatory No. 5. Has MCI ever been required to discount the rates for any of its services where the discount was imposed as a penalty for MCI's failure to provide resellers or other interexchange carrier with access to its operational systems? If so, please explain.

MCI Objection: MCI objects to this interrogatory 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.

Interrogatory No. 6. Please identify every person giving testimony for MCI or any of its affiliates with regard to the resale of local exchange company services in any jurisdiction. Please state where such testimony was given and if such testimony was presented, identify the testimony.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is overly broad, unduly burdensome, and oppressive. There are no time or jurisdictional limits on the information requested, thereby requiring MCI to conduct an exhaustive search of publicly available information, all to obtain information which will be of little value, due as it is two days before the hearing in this case begins.

Interrogatory No. 7. If not provided in response to an earlier request, please identify any estimates, forecasts, studies or any other plans which indicate the level of penetration MCI expects or has experienced for local residential and business service. In Florida, if available, please provide this information broken down by resold products.

MCI objection: MCI objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, oppressive, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, it seeks information which is subject to the attorney/client, work product and trade secrets privileges. The scope of this proceeding is to determine the obligations of BellSouth pursuant to the Telecommunications Act of 1996. MCI's plans to enter the local exchange market and any information related thereto are not within the scope of this proceeding.

Interrogatory No. 10. For each jurisdiction in which MCI operates, or plans or intends to operate as a reseller of local telecommunications services (either as a "pure reseller," a "combination reseller and facilities-based provider" or a "facilities-based provider"), list each and every local telecommunications service purchased by MCI, or which MCI plans or intends to purchase from an incumbent local exchange carrier for the purpose of resale by MCI to end user customers.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the 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.

Interrogatory No. 11. For each service identified in Interrogatory No. 10 currently purchased by MCI or if no services were identified in Interrogatory No. 10, for each telecommunications service currently purchased by MCI, indicate whether MCI purchases the local telecommunications services for the same price as end user customers of the incumbent local exchange carrier or whether MCI purchases such services at a discounted price.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the 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.

Interrogatory No. 12. For each service identified in Interrogatory No. 11 that MCI currently purchases at discounted price, provide the following information:

- (a) the type of discount (term, volume, across-the-board, etc.);
- (b) the amount of the discount;
- © the basis for the discount (PSC order, LEC initiative, negotiated agreement, etc.)

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the 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.

Interrogatory No. 14. In each jurisdiction where MCI plans to purchase local telecommunications services from an incumbent local exchange carrier at a discounted price for resale by MCI to end user customers and where there is a pending state regulatory proceeding to address the issue of resale, provide the following information:

- (a) the regulatory proceeding/docket number (if applicable);
- (b) identify any MCI sponsored testimony supporting/recommending a discount;
- © identify any MCI sponsored testimony supporting/recommending which services offered by an incumbent local exchange carrier(s) should be subject to the discount;
- (d) identify any studies, workpapers, analyses, white papers, proposed rules, illustrative tariffs, testimony, exhibits, etc., in support of MCI's recommended discount;

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is overly broad, unduly burdensome, and oppressive. There are no time or jurisdictional limits on the information requested, thereby requiring MCI to conduct an exhaustive search of publicly available information, all to obtain information which will be of little value, due as it is two days before the hearing in this case begins.

Interrogatory No. 17. Does MCI avoid or incur any cost when MCI's services are made available for resale? If so, identify the specific costs that are avoided, either partially or completely. If not, explain why not.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the 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.

Interrogatory No. 18. Since 1982, has MCI ever been required by a regulatory commission or a court to discount the price of any of its retail interLATA service offerings for the purpose of allowing its competitors to purchase a service at the discounted price and resell the service to end user customers? If yes, identify the applicable commission or court order requiring such, as well as tariffs, prices, and cost studies related to these services.

MCI objection: MCI objects to this interrogatory on the grounds that the request seeks information which is irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, overly broad, unduly burdensome, oppressive, and is beyond the scope of this proceeding.

Interrogatory No. 20. Does MCI allow direct on-line access to its operational support systems by resellers of its interLATA service offerings? If yes, identify with specificity each and every system, the type of access permitted, and the terms and conditions associated with such access. If not, explain why not and how MCI provides service to resellers of its services without providing direct on-line access to operational support systems.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the 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.

Interrogatory No. 21. Identify each and every strategic plan, marketing plan, business plan, business case study, policy statement, memoranda, letter, report, white paper, market forecast, revenue impact study, action plan, illustrative tariffs, etc., related to the resale of incumbent local exchange carriers' local telecommunications services by MCI to end user customers.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the 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.

Interrogatory No. 22. Please identify each and every jurisdiction where MCI has filed for or been involved in mediation under the Federal Telecommunications Act. Your response should include the regulatory proceeding docket number (if applicable).

MCI objection: MCI objects to this interrogatory on the grounds that the request seeks information which is irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, overly broad, unduly burdensome, oppressive, and is beyond the scope of this proceeding.

Interrogatory No. 23. Identify all documents which support or provide the basis for MCI's positions in connection with any mediation proceedings identified in Interrogatory No. 22.

MCI objection: MCI objects to this interrogatory on the grounds that the request seeks information which is irrelevant, not reasonably calculated to lead to the discovery of admissible

evidence, overly broad, unduly burdensome, oppressive, and is beyond the scope of this proceeding.

Interrogatory No. 24. Identify any and all individuals who have authority to approve MCI positions taken or to be taken in connection with any mediation proceedings. (Identify the specific person with authority regarding each specific issue.)

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the 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.

Interrogatory No. 25. Please identify each and every jurisdiction where MCI has filed for arbitration under the Federal Telecommunications Act. Your response should include the regulatory proceeding docket number (if applicable).

MCI objection: MCI objects to this interrogatory on the grounds that the request seeks information which is irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, overly broad, unduly burdensome, oppressive, and is beyond the scope of this proceeding.

Interrogatory No. 26. Identify all documents, not previously identified, which provide the basis for or establishes MCI's positions in connection with any arbitration proceedings identified in Interrogatory No. 25.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably

calculated to lead to the discovery of admissible evidence. Moreover, the 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.

Interrogatory No. 27. Identify any and all individuals who have authority to approve MCI's positions taken or to be taken in connection with any arbitration proceedings.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the 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.

Interrogatory No. 29. Please identify all documents which touch upon, describe, or otherwise address the subject of arbitration and MCI's position thereon.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the 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.

Interrogatory No. 30. Please identify all documents that touch upon/describe, or otherwise address the appropriate levels of resale discounts.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the 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.

Interrogatory No. 31. Please state whether MCI is currently providing resale in any jurisdiction. If so, please state the discount MCI provides off of its retail prices for such services and whether or not MCI is making a profit off of such discounted services.

MCI objection: MCI objects to this interrogatory on the grounds that the request seeks information which is irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, overly broad, unduly burdensome, oppressive, and is beyond the scope of this proceeding.

Interrogatory No. 32. Please identify all services that MCI provides to resellers.

MCI objection: MCI objects to this interrogatory on the grounds that the request seeks information which is irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, overly broad, unduly burdensome, oppressive, and is beyond the scope of this proceeding.

Interrogatory No. 33. Please identify all documents that touch upon, describe, or otherwise address matters or issues of policy in connection with MCI providing services for resale, including MCI's relationships or contracts, guidelines, etc., for dealing with resellers of MCI's services.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the 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.

Interrogatory No. 34. Please state whether MCI brands MCI's services as those of a reseller when the reseller purchases such services for resale from MCI.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the 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.

Interrogatory No. 35. Please identify all documents that touch upon, describe, or otherwise address the subject of "branding" of MCI's services by resellers.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence.

Moreover, the 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.

Interrogatory No. 36. Please identify all documents that touch upon, describe, or otherwise address any licensing agreements for MCI's services by resellers.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the 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.

Interrogatory No. 37. Please state whether MCI offers or allows resellers to have "branded" operator services from MCI.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the 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.

Interrogatory No. 38. Please identify all documents that touch upon, describe, or otherwise address "branded" operator services.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the 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.

Interrogatory No. 39. Please state whether MCI provides or has any unique, distinct, or special operational interfaces specifically for resellers of MCI's services.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the 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.

Interrogatory No. 40. Please identify all documents that touch upon, describe or otherwise address any unique, distinct, different, or special operational interfaces for resellers of MCI's services.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the 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.

Interrogatory No. 41. Please state whether MCI has any restrictions with regard to resale of its services, including whether or not it places restrictions on allowing resellers a discount off of any "special pricing", "promotions", etc. that MCI provides to its own end user customers.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the 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.

Interrogatory No. 42. Please identify all documents that touch upon, describe, otherwise address any limitations, conditions, or restrictions MCI imposes upon resellers of its services.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the 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.

Interrogatory No. 45. Please identify all documents that touch upon, describe or otherwise address any evaluations or analyses any studies identified in Interrogatory No. 44 regarding prices for any unbundled network elements.

MCI objection: MCI objects to this interrogatory on the grounds

that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the 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.

Interrogatory No. 46. Please identify all documents that touch upon, describe or otherwise address MCI's evaluations of any resale discount cost studies.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the 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.

Interrogatory No. 47. Please state with specificity MCI's strategy for establishing resale discounts for services to be purchased from incumbent local exchange carriers. If not otherwise identified in response to this interrogatory or another one, identify any document which discusses, describes or otherwise touches upon a strategy of asking a regulatory commission for a resale discount higher than the one offered by BellSouth or any LEC, with the expectation that the regulatory commission would set the final discount rate at a point between MCI's recommended discount and BellSouth's recommended discount.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the 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.

Interrogatory No. 48. Please identify any and all services MCI provides that are priced below the incremental cost of such services.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the 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.

Interrogatory No. 49. Please describe with specificity MCI's policy in connection with pricing its services and identify all documents describing or touching upon that policy. Your answer should include or not such pricing policy provides or requires that all such services should include a contribution toward joint and common costs or overhead costs of MCI.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the 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.

Interrogatory No. 50. Please state whether MCI has any

customers who are purchasing "grandfathered" services (meaning services that MCI provided at one point in time to customers, who continue to receive those services, despite the fact that MCI no longer generally provides such services to new customers). Please describe how many such customers there are and identify the type contracts involved.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the 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.

Interrogatory No. 51. Please identify all documents that touch upon, describe, or otherwise address "grandfathered" services.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the 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.

Interrogatory No. 52. Please identify the exact number of sales promotions or "special pricing" that MCI has conducted or run during the last 12 months in BellSouth's service territory and specifically for Florida.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence.

Moreover, the 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.

Interrogatory No. 53. Please identify all documents that touch upon, describe, or otherwise address all sales promotions or "special pricing" that MCI has conducted or run during that last 12 months in BellSouth's territory and specifically for Florida.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the 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.

Interrogatory No. 56. For each state listed in response to the preceding Interrogatory No. 55, please provide the following information:

- (a) the docket number and other identifying information if the matter was a docketed proceeding;
- (b) whether an order was rendered and the date of the order;
- (c) if an order was rendered, whether it was for an interim/temporary or permanent arrangement for resale, unbundling, local interconnection;
- (d) if an order was rendered, the date it is to be implemented, or if already implemented, the date of implementation;
- (e) identify all parties or persons participating in the docket;
- (f) if an order was issued, list the technical arrangements contained therein, including the location(s) at which local interconnection is allowed (e.g. tandem, in the office, etc.), network interfaces are located, operational functions, etc.;

- (g) if an order was issued, identify whether the rate mechanism for local interconnection was (i) usage based; (ii) flat-rate based; (iii) bill and keep; or (iv) other (specify in detail);
- (h) if the rate mechanism for local interconnection is usage based or flat-rate based, identify the specific rate(s).

MCI objection: MCI objects to this interrogatory on the grounds that the request seeks information which is irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, overly broad, unduly burdensome, oppressive, and is beyond the scope of this proceeding. Moreover, the requested information is publicly available to BellSouth.

Interrogatory No. 57. If MCI has reached an agreement for resale, unbundling, local interconnection, whether in a docketed matter or otherwise, please describe in detail the provisions of the agreement, including, at a minimum, the type of information requested in Interrogatory No. 56 (c) through (h).

MCI objection: MCI objects to this interrogatory on the grounds that the request seeks information which is irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, overly broad, unduly burdensome, oppressive, and is beyond the scope of this proceeding.

Interrogatory No. 58. For each state listed in response to Interrogatory No. 55, please provide the following information:

- (a) whether an order or agreement concerning universal service has been rendered and if so, the date of such order or agreement;
- (b) if an order has been rendered, or an agreement reached, the date it is to be implemented, or if already implemented, the date of implementation;
- (c) if an order has been rendered or an agreement reached, whether it was for an interim/temporary or permanent arrangement for universal service;

- (d) effective such order or agreement on the resale unbundling, local interconnection dockets or agreement if one was reached;
- (e) the summary of the terms and conditions of the order or agreement.

MCI objection: MCI objects to this interrogatory on the grounds that the request seeks information which is irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, overly broad, unduly burdensome, oppressive, and is beyond the scope of this proceeding. Moreover, the requested information is publically available to BellSouth.

Interrogatory No. 59. For each state listed in response to Interrogatory No. 55, please provide the following information:

- (a) whether an order or agreement concerning local portability has been rendered, and if so, the date of such order or agreement;
- (b) identify all parties participating in any local member portability docket or agreement.
- (c) a description of the mechanism ordered for local number portability;
- (d) the effect of such an order or agreement on any resale unbundling, local interconnection agreements or orders.

MCI objection: MCI objects to this interrogatory on the grounds that the request seeks information which is irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, overly broad, unduly burdensome, oppressive, and is beyond the scope of this proceeding. Moreover, the requested information is publicly available to BellSouth.

Interrogatory No. 60. For each state listed in response to Interrogatory No. 55, please provide the following information:

- (a) whether an order or agreement concerning local number portability has been rendered, and if so, the date of

- such or agreement;
- (b) a description of the order or agreement;
- (c) identify all terms, prices what rates associated with the order or agreement;
- (d) the effect of such an order or agreement on the resale unbundling, local interconnection arrangements or order.

MCI objection: MCI objects to this interrogatory on the grounds that the request seeks information which is irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, overly broad, unduly burdensome, oppressive, and is beyond the scope of this proceeding.

Interrogatory No. 61. For each state identified in response to Interrogatory No. 55, please state whether there has been a judicial appeal of any order rendered in the resale, unbundling, or local interconnection docket. If your answer is in the affirmative, please identify the court in which such an appeal lies, the case number, the basis of the appeal and current status of the appeal.

MCI objection: MCI objects to this interrogatory on the grounds that the request seeks information which is irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, overly broad, unduly burdensome, oppressive, and is beyond the scope of this proceeding. Moreover, the requested information is publicly available to BellSouth.

Interrogatory No. 62. Is MCI attempting to obtain the individual piece parts of the unbundled local loop at a price which would allow the recombination of such piece parts for a total price that was lower than the complete unbundled loop?

MCI objection: MCI objects to this interrogatory on the grounds that the request seeks information which is irrelevant, not reasonably calculated to lead to the discovery of admissible

evidence, overly broad, unduly burdensome, oppressive, and is beyond the scope of this proceeding.

Interrogatory No. 63. If the answer to the preceding question was in the negative, would MCI agree that, if it wishes to purchase all four sub-elements of an unbundled loop and recombine those elements to provide a single loop, it will pay the same rate as would have been charged for an unbundled loop in the first place?

MCI objection: MCI objects to this interrogatory on the grounds that the request seeks information which is irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, overly broad, unduly burdensome, oppressive, and is beyond the scope of this proceeding.

Interrogatory No. 65. Please identify each BellSouth end office in Florida to which MCI either has an existing facility (copper or fiber) running between the end office and MCI's own switched in Florida, or has a facility (copper or fiber) running between MCI's switches and the BellSouth tandem switch that serves the end office.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the 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.

Interrogatory No. 68. Describe any and all internal memoranda, studies, or analyses which contain a comparison or other discussion of the electronic interfaces requested by MCI in this proceeding and other interfaces, or interface solutions.

MCI objection: MCI objects to this interrogatory on the grounds that the information requested is irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, the 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.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by hand delivery this 27th day of September, 1996.

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