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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: MCI Telecommunications)	
Corporation's Petition to Reduce)	Docket No.
CCL to Remove DeRegulated Payphone)	
Investment from the rates of)	Filed: February 7, 1997
BellSouth Telecommunications, Inc.)	

MCI'S NOTICE OF SERVICE OF FIRST SET OF INTERROGATORIES
AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO
BELLSOUTH TELECOMMUNICATIONS, INC.

MCI Telecommunications Corporation (MCI) hereby gives notice of service of its First Set of Interrogatories and First Request for Production of Documents to BellSouth Telecommunications, Inc. this 7th day of February, 1997.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of this Notice and the original of MCI's First Set of Interrogatories and First Request for Production of Documents was served on Nancy White, c/o Nancy Sims, BellSouth Telecommunications, 150 S. Monroe Street, Suite 400, Tallahassee, FL 32301 this 7th day of February, 1997.

HOPPING GREEN SAMS & SMITH, P.A.

By: Richard D. Melson
Richard D. Melson
P.O. Box 6526
Tallahassee, FL 32314
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and

MICHAEL J. HENRY
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DOCUMENT NUMBER-DATE
01450 FEB-76
FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by hand delivery this 7th day of February, 1997.

Martha Carter Brown
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

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

Richard M.

Attorney

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: MCI Telecommunications)
Corporation's Petition to Reduce) Docket No.
CCL to Remove DeRegulated Payphone)
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BellSouth Telecommunications, Inc.)

**MCI'S FIRST SET OF INTERROGATORIES TO
BELLSOUTH TELECOMMUNICATIONS, INC.**

MCI Telecommunications Corporation (MCI), pursuant to Rules 25-22.035 and 25-22.037, Florida Administrative Code, and Rule 1.340, Florida Rules of Civil Procedure, hereby propounds the following interrogatories to BellSouth Telecommunications, Inc. (BellSouth or Company). All objections and answers should be served upon the attorneys for MCI within 30 days from the date of service of this request.

Each interrogatory should be answered under oath, and should be answered based on actual knowledge or upon information and belief, and should state if it is given on the latter basis. If the complete answer to an interrogatory is not known, so state and answer as fully as possible the part of the interrogatory to which the answer is known. If the response to any interrogatory is that the information requested is not currently available, state when the information requested will be available.

For each answer, or part thereof, please identify the individual or individuals who provided the information or assisted in providing the information contained in the responses. If the individual or individuals identified will not be a witness

during hearings in this docket, please also identify a witness sponsored by BellSouth who will be responsible for each answer or part thereof.

INSTRUCTIONS

If any response would request the production of proprietary materials, please contact MCI's attorneys so that an appropriate proprietary agreement can be executed prior to the scheduled response date.

DEFINITIONS

1. As used herein, "you" and "your" shall mean BellSouth together with its employees, agents, consultants, experts, affiliates, subsidiaries, and, unless privileged, its attorneys. It also includes all other persons acting on BellSouth's behalf or persons controlling or acting together as one with BellSouth not otherwise covered by the foregoing description.

2. Please construe "and" as well as "or" either disjunctively or conjunctively as necessary to bring within the scope of these interrogatories any information that might otherwise be construed as outside their scope.

3. "Person" shall mean any natural person and any corporation, partnership, joint venture, association, or other legal entity or any other group of persons associated for the purpose of any common goal or achieving any common result.

4. "Identify," unless the context indicates otherwise, means the following:

(a) With regard to a document, the author, recipient, title, subject matter, date and any other information which will allow the document to be identified in a unique way;

(b) With regard to a person, the name of the person, his title and address.

5. "Act" refers to the Telecommunications Act of 1996.

6. The singular shall be construed to include the plural, and vice versa. Masculine terms shall be construed to include the feminine, and vice versa.

7. These interrogatories are limited to the Company's operations in Florida.

INTERROGATORIES

1. (a) Please provide a computation of the intrastate deregulated payphone revenue requirement following the format of the interstate revenue requirement filed with the FCC for calendar year 1995. The response should be provided in both hard copy and on a diskette with the software and version identified and all cell formulas left intact.

(b) Please provide all assumptions, data, computations, workpapers and supporting documentation for the Company's computation of the intrastate revenue requirement provided in response to part (a) of this question. Provide both hard copies and diskette files with the software and version identified and all cell formulas left intact. Assumptions, data, computations, workpapers, and other supporting documentation should be provided in sufficient detail to replicate the Company's separations and allocations from the ARMIS data (total Company, total interstate, total intrastate) as well as the deregulated payphone elements of that data.

2. (a) Please provide a computation of the intrastate deregulated payphone revenue requirement following the format of the interstate revenue requirement filed with the FCC for calendar year 1996. The response should be provided in both hard

copy and on a diskette with the software and version identified and all cell formulas left intact.

(b) Please provide all assumptions, data, computations, workpapers and supporting documentation for the Company's computation of the intrastate revenue requirement provided in response to part (a) of this question. Provide both hard copies and diskette files with the software and version identified and all cell formulas left intact. Assumptions, data, computations, workpapers, and other supporting documentation should be provided in sufficient detail to replicate the Company's separations and allocations from the ARMIS data (total Company, total interstate, total intrastate) as well as the deregulated payphone elements of that data.

3. (a) Please identify and describe any intrastate payphone revenue that the Company believes will be deregulated concurrent with the deregulation of the investment and related expenses.

(b) Please quantify for the 1995 calendar year by Part 32 account and subaccount each intrastate payphone revenue identified in response to part (a) of this question. Provide all assumptions, data, computations, workpapers and other supporting documentation if this revenue amount is a computation rather than separately identified in the Company's revenue accounting.

(c) Please quantify for the 1996 calendar year by Part 32 account and subaccount each intrastate payphone revenue identified in response to part (a) of this question. Provide all assumptions, data, computations, workpapers and other supporting documentation if this revenue amount is a computation rather than separately identified in the Company's revenue accounting.

4. (a) Please identify and describe each tariffed and non-tariffed service that the Company will provide and revenues which the Company's regulated telephone operations will receive from the Company's deregulated payphone operations upon the deregulation of the payphone station equipment investment and expenses. These revenues should include, but not be limited to, COCOT line charges, central office based blocking and screening services, directory assistance services, operator services, etc.

(b) For each tariffed service identified in part (a), of this interrogatory, please provide a reference to the Company's existing tariff(s).

(c) For each intrastate revenue source identified in response to part (a) of this interrogatory, please provide a computation of annual intrastate revenues that the Company would

have received in 1996 had the Company's payphone operations been deregulated, based on year end 1996 actual data such as existing tariffed rates, number of Company owned payphones, number of directory assistance calls from Company owned payphones, etc. Provide all assumptions, data, computations, workpapers, and other supporting documentation in hard copy and diskette. Identify the spreadsheet software and version and leave all cell formulas intact.

(d) For each intrastate revenue source identified in response to part (a) of this interrogatory, please provide a computation of annual intrastate revenues projected for 1997 based on the same format as described in part (c) of this interrogatory.

(e) For each intrastate revenue source identified in response to part (a) of this interrogatory, please provide a copy of the current tariff pages for the services referenced as well as a copy of any proposed and/or approved but pending revisions to existing tariffs. Also provide a copy of the Company's filing and Commission's Order, if any.

5. (a) Please state the number of payphones owned by the Company at year end 1995.

(b) Please state the number of payphones owned by the company at year end 1996.

(c) Please state the number of payphones projected to be owned by the Company or its affiliates at year end 1997.

6. (a) Please state the Company's current COCOT line rate in Florida.

(b) Please identify the current tariff pursuant to which such rate is imposed.

(c) Please identify any filing made by the Company to revise its COCOT line rate currently pending before the Florida Public Service Commission.

7. (a) Please provide a segregation of the revenues in account 5010 by revenue source for calendar year 1995. If the Company maintains revenue data by subaccount, also provide it by subaccount along with a description of each subaccount.

(b) Please provide a segregation of the revenues in account 5010 by revenue source for calendar year 1996. If the

Company maintains revenue data by subaccount, also provide it by subaccount along with a description of each subaccount.

(c) Please provide a projection of revenues in account 5010 by revenue source for calendar 1997. If the Company maintains revenue data by subaccount, also provide it by subaccount along with a description of each subaccount.

8. (a) Please identify the Company's most recent Florida Public Service Commission order wherein it determined the Company's intrastate revenue requirement.

(b) Please identify the Company's most recent Florida Public Service Commission order wherein it determined the level of the Company's intrastate access charges.

(c) Please identify any documentation developed or maintained by the Company that supports the basis, cost or otherwise, for the Commission's most recent order authorizing the Company's intrastate access charges.

(d) Please identify the Company's most recent Florida Public Service Commission order wherein it established a basis for tariffs other than traditional cost-based recovery, such as an incentive rate plan or price cap regulation.

(e) Please provide a detailed description of how the Company believes the plan established in the order identified in response to part (d) of this question affects the level of intrastate access charges.

* * * * *

SERVED this 7th day of February, 1997.

HOPPING GREEN SAMS & SMITH, P.A.

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MCI'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO
BELLSOUTH TELECOMMUNICATIONS, INC.

MCI Telecommunications Corporation (MCI), pursuant to Rules 25-22.034, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, hereby requests BellSouth Telecommunications, Inc. (BellSouth or Company) to produce the following documents for inspection and copying at the offices of Hopping Green Sams & Smith, P.A., 123 South Calhoun Street, Tallahassee, Florida, within 30 days of the date of service of this request, or at such other time and place as may be mutually agreed upon by counsel.

INSTRUCTIONS

1. If any response would request the production of proprietary materials, please contact MCI's attorneys so that an appropriate proprietary agreement can be executed prior to the scheduled response date.
2. If any document is withheld under any claim of privilege, furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients, recipients of copies, subject matter of

the documents, and the basis upon which such privilege is claimed.

3. If BellSouth has possession, custody or control of the originals of the documents requested, please produce the original or a complete copy of the original and all copies which are different in any way from the original, whether by interlineation, receipt stamp, or notation. If BellSouth does not have possession, custody or control of the originals of the documents requested, please produce any copies in the possession, custody or control, however made, of BellSouth.

4. "Person" shall mean any natural person and any corporation, partnership, joint venture, association, or other legal entity or any other group of persons associated for the purpose of any common goal or achieving any common result.

5. "Document" refers to written matter of any kind, regardless of its form, and to information recorded on any storage medium, whether in electronic, optical or electromagnetic form, and capable of reduction to writing by the use of computer hardware and software.

PRODUCTION REQUESTS

1. Provide a copy of any document identified and requested in response to Interrogatory No. 4.

2. Provide a copy of the tariff identified in response to Interrogatory No. 5(b).


3. Provide a copy of any document identified in response to Interrogatory No. 5(c).

4. Provide a copy of all documents identified in response to Interrogatory Nos. 7(a), 7(b), 7(c), and 7(d).

* * * * *

SERVED this 7th day of February, 1997.

HOPPING GREEN SAMS & SMITH, P.A.

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