

June 26, 2000

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

RECORDS AND  
REPORTING

60 JUN 26 PM 4:48

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Re: Docket No. 990649-TP

Dear Ms. Bayó,

Enclosed for filing in the above-referenced docket are an original and fifteen (15) copies each of MCI WorldCom, Inc.' Objection to GTE Florida Incorporated's First Request for Production of Documents and First Set of Interrogatories.

Also enclosed for filing in the above-referenced docket are an original and fifteen (15) copies each of AT&T Communications of the Southern States, Inc. and MCI WorldCom, Ins.'s Joint Objections to GTE Florida Incorporated's First Set of Joint Interrogatories and First Request for Joint Production of Documents.

Copies of the foregoing are being served on all parties of record in accordance with the attached Certificate of Service.

Thank you for your assistance with this matter.

Sincerely,

*Donna Canzano McNulty*  
Donna Canzano McNulty

- APP \_\_\_\_\_ Enclosures
- CAF \_\_\_\_\_
- CMP 5
- COM 5
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- LEG 2
- OPC \_\_\_\_\_
- PAI \_\_\_\_\_
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DOCUMENT NUMBER-DATE

07766 JUN 26 8

FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of )  
unbundled network elements )  
\_\_\_\_\_ )

Docket No. 990649-TP

Filed: June 26, 2000

**MCI WORLDCOM'S OBJECTIONS TO GTE FLORIDA INCORPORATED  
FIRST SET OF INTERROGATORIES (NO. 1-8)**

MCI WorldCom, Inc., and its operating subsidiaries (hereinafter "MCI 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 GTE Florida Incorporated's (hereinafter "GTEFL") First Set of Interrogatories to MCI WorldCom Inc.

**The Objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the five-day requirement set forth in Order No. PSC-00-2015-PCO-TP issued by the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced docket on June 8, 2000.**

**Should additional grounds for objection be discovered as MCI WorldCom prepares its Answers to the above-referenced set of interrogatories, MCI WorldCom reserves the right to supplement, revise, or modify its objections at the time that it serves its Answers on GTEFL. Moreover, should MCI WorldCom determine that a Protective Order is necessary with respect to any of the material requested by GTEFL, MCI WorldCom reserves the right to file a motion with the Commission seeking such an order at the time that it serves its Answers on GTEFL.**

DOCUMENT NUMBER-DATE

07766 JUN 26 8

FPSC-RECORDS/REPORTING

### General Objections

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

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

MCI WorldCom objects to the definitions of "MCI" 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, MCI WorldCom has interpreted GTEFL's interrogatories to apply to MCI 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, MCI WorldCom objects to such interrogatory as irrelevant, overly broad, unduly burdensome, and oppressive.

3. MCI WorldCom objects to each and every interrogatory and instruction to the extent that such interrogatory or instruction calls for information that is exempt from

discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. MCI 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 MCI WorldCom in response to GTEFL's interrogatories will be provided subject to, and without waiver of, the foregoing objection.

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

6. MCI WorldCom objects to GTEFL's general instructions, definitions or specific discovery requests insofar as they seek to impose obligations on MCI WorldCom which exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

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

8. MCI 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. MCI 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 GTEFL's interrogatories request proprietary

confidential business information which is not subject to the "trade secrets" privilege, MCI WorldCom will make such information available to counsel for GTEFL 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, MCI WorldCom enters the following specific objections with respect to GTEFL's interrogatories:

**INTERROGATORY NO. 1:** Please provide, by account, the depreciation lives and salvage values that MCI WorldCom uses to depreciate its plant and equipment.

**OBJECTION:** MCI WorldCom objects to this interrogatory 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.

**INTERROGATORY NO. 2:** Please provide the depreciation rate MCI WorldCom applies to each of its plant and equipment accounts.

**OBJECTION:** MCI WorldCom objects to this interrogatory 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.

**INTERROGATORY NO. 3:** MCI WorldCom has announced trials of "fixed wireless" MMDS service. Please describe MCI WorldCom's plans to provide service in Florida using fixed wireless technology, including the date such service will be initiated.

**OBJECTION:** MCI WorldCom objects to this interrogatory 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.

**INTERROGATORY NO. 4:** Please provide, by account, the depreciation lives and salvage values MCI WorldCom uses to depreciate its fixed wireless equipment.

**OBJECTION:** MCI WorldCom objects to this interrogatory 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.

**INTERROGATORY NO. 5:** Does MCI WorldCom plan to offer local telephone service in Florida over any of its own or any affiliates' facilities any time within the next three years? If so, please describe such plans, including the projected date such service will be initiated and the areas in which service will be provided.

**OBJECTION:** MCI WorldCom objects to this interrogatory 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.

**INTERROGATORY NO. 6:** Please describe and identify, by location, any and all switches and cable routes owned or operated by MCI WorldCom in Florida.

**OBJECTION:** MCI WorldCom objects to this interrogatory 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.

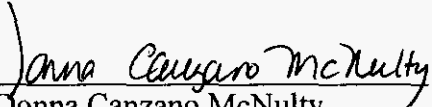
**INTERROGATORY NO. 7:** Please list any customers, either business or residential, by serving location, to which MCI WorldCom provides local telephone service in Florida.

**OBJECTION:** MCI WorldCom objects to this interrogatory 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. Moreover, to the extent this request seeks customer specific information, MCI WorldCom is prohibited by Section 364.24, Florida Statutes, from disclosing customer account information except as authorized by the customer or as necessary for billing purposes, or required by subpoena, court order, other process of court, or as otherwise allowed by law.

**INTERROGATORY NO. 8:** Please provide, by account, the depreciation lives and salvage values that MCI WorldCom or any affiliate uses to depreciate plant and equipment used to provide local telephone service in Florida.

**OBJECTION:** MCI WorldCom objects to this interrogatory 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.

Respectfully submitted,

  
Donna Canzano McNulty

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Attorney for MCI WorldCom, Inc.



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U.S. Mail, hand delivered (\*) or Federal Express (\*\*\*) this 26th day of June, 2000.

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\_\_\_\_\_  
Attorney

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into pricing of )  
unbundled network elements )  
\_\_\_\_\_ )

Docket No. 990649-TP

Filed: June 26, 2000

**MCI WORLDCOM'S OBJECTIONS TO GTE FLORIDA INCORPORATED  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-5)**

MCI WorldCom, Inc., and its operating subsidiaries (hereinafter "MCI 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 GTE Florida Incorporated's (hereinafter "GTEFL") First Request for Production of Documents (Nos. 1 - 5) to MCI WorldCom Inc.

**The Objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the five-day requirement set forth in Order No. PSC-00-2015-PCO-TP issued by the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced docket on June 8, 2000. Should additional grounds for objection be discovered as MCI WorldCom prepares its Answers to the above-referenced discovery request, MCI WorldCom reserves the right to supplement, revise, or modify its objections at the time that it serves its Answers on GTEFL. Moreover, should MCI WorldCom determine that a Protective Order is necessary with respect to any of the material requested by GTEFL, MCI WorldCom reserves the right to file a motion with the Commission seeking such an order at the time that it serves its Answers on GTEFL.**

## General Objections

MCI WorldCom makes the following General Objections to GTEFL's First Set of Requests for Production of Documents that will be incorporated by reference into MCI WorldCom's specific responses when its Responses are served on GTEFL.

1. MCI WorldCom objects to GTEFL's First Set of Requests for Production of Documents to the extent that it is overly broad, unduly burdensome, oppressive, not permitted by applicable discovery rules, and would require MCI WorldCom to disclose information which is privileged.

2. MCI WorldCom has interpreted GTEFL's requests to apply to MCI WorldCom's regulated intrastate operations in Florida and will limit its Responses 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, MCI WorldCom objects to such request as irrelevant, overly broad, unduly burdensome, and oppressive.

3. MCI WorldCom objects to each and every request and instruction to the extent that such request or instruction calls for information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege or other applicable privilege.

4. MCI 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 Responses provided by MCI WorldCom in response to GTEFL's requests will be provided subject to, and without waiver of, the foregoing objection.

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

6. MCI WorldCom objects to GTEFL's general instructions, definitions or specific discovery requests insofar as they seek to impose obligations on MCI WorldCom which exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

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

8. MCI WorldCom objects to each and every request, general instruction, or definition insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. MCI WorldCom 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 GTEFL's requests seek proprietary confidential business information which is not the subject of the "trade secrets" privilege, MCI WorldCom will make such information available to counsel for GTEFL pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

10. MCI WorldCom is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, MCI WorldCom creates countless documents that are not subject to Florida Public Service Commission or FCC retention of records requirements. These documents are kept in

numerous locations and are frequently moved from site to site as employees change jobs or as the business is reorganized. Rather, these responses will provide all of the information obtained by MCI WorldCom after a reasonable and diligent search conducted in connection with this discovery request. MCI WorldCom will comply with GTEFL's request that a search be conducted of those files that are reasonably expected to contain the requested information. To the extent that the discovery request purports to require more, MCI WorldCom objects on the grounds that compliance would impose an undue burden or expense.

11. MCI WorldCom objects to the definitions of "MCI" 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 MCI WorldCom Inc.'s certificated entities that provide regulated telecommunications services in Florida and are applicable to this docket.

12. MCI WorldCom objects to the definitions of "you" and "your" to the extent that such definitions seek to impose an obligation on MCI WorldCom, Inc. and its operating subsidiaries certificated in Florida, 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 the MCI

WorldCom, Inc. operating subsidiaries that are certificated to provide regulated telecommunications services in Florida.

Objections to Specific Requests

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

**REQUEST NO. 1:** Please provide all documents relating to MCI's plans to provide telephone service using fixed wireless technology, including, but not limited to, documents discussing any fixed wireless trials.

**OBJECTION:** MCI WorldCom objects to Request for Production of Documents No. 1 on the grounds that 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.

**REQUEST NO. 2:** Please provide all documents relating to MCI's plans to provide telephone service in Florida over its own cable television facilities or the cable television facilities of any affiliated or non-affiliated entities.

**OBJECTION:** MCI WorldCom objects to Request for Production of Documents No. 2 on the grounds that 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.

**REQUEST NO. 3:** Please provide all documents relating to any joint marketing plans between MCI WorldCom and any Time Warner affiliate.

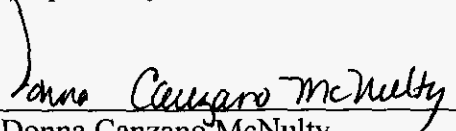


**OBJECTION:** MCI WorldCom objects to Request for Production of Documents No. 3 on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

**REQUEST NO. 4:** Please provide all documents discussing MCI's providing telephone service using Time Warner's facilities in Florida.

**OBJECTION:** MCI WorldCom objects to Request for Production of Documents No. 4 on the grounds that 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.

Respectfully submitted,

  
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Attorney for MCI WorldCom, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U.S. Mail, hand delivered (\*) or Federal Express (\*\*) this 26th day of June, 2000.

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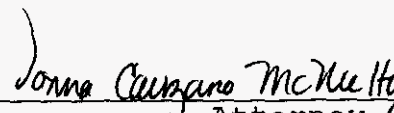
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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into pricing of )  
unbundled network elements )  
\_\_\_\_\_ )

Docket No. 990649-TP  
Filed: June 26, 2000

**AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC. AND MCI  
WORLDCOM, INC.'S JOINT OBJECTIONS TO GTE FLORIDA  
INCORPORATED  
FIRST SET OF JOINT INTERROGATORIES**

AT&T Communications of the Southern States, Inc. and MCI WorldCom, Inc., and its operating subsidiaries (collectively "AT&T/MCI 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 submit the following Objections to GTE Florida Incorporated's (hereinafter "GTEFL") First Set of Joint Interrogatories to AT&T/MCI WorldCom Inc.

**The Objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the five-day requirement set forth in Order No. PSC-00-2015-PCO-TP issued by the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced docket on June 8, 2000. Should additional grounds for objection be discovered as AT&T/MCI WorldCom prepare their Answers to the above-referenced discovery request, AT&T/MCI WorldCom reserve the right to supplement, revise, or modify their objections at the time that they their Answers on GTEFL. Moreover, should AT&T/MCI WorldCom determine that a Protective Order is necessary with respect to any of the material requested by GTEFL, AT&T/MCI WorldCom reserve the right to file a motion**

**with the Commission seeking such an order at the time that they serve their  
Answers on GTEFL.**

General Objections

AT&T/MCI WorldCom make the following General Objections to GTEFL's First Set of Interrogatories which will be incorporated by reference into AT&T/MCI WorldCom's specific responses when their Answers are served on GTEFL.

1. 1. AT&T objects to the following provisions of the "Definitions" section of GTEFL's First Set of Interrogatories:

AT&T objects to the definitions of "AT&T" to the extent that such definitions seek to impose an obligation on AT&T Communications of the Southern States, Inc. 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 AT&T Communications of the Southern States, Inc. which is the interexchange carrier (hereinafter "IXC") certificated to provide regulated telecommunications services in Florida and which is a party to this docket. All references to "AT&T" in responding to GTEFL's interrogatories should be taken to mean AT&T Communications of the Southern States, Inc.

2. MCI WorldCom objects to the following provisions of the "Definitions" section of GTEFL's First Set of Interrogatories:

MCI WorldCom objects to the definitions of "MCI" 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.

3. Unless otherwise indicated, AT&T/MCI WorldCom have interpreted GTEFL's interrogatories to apply to their regulated intrastate operations in Florida and will Answer 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, AT&T/MCI WorldCom object to such interrogatory as irrelevant, overly broad, unduly burdensome, and oppressive.

4. AT&T/MCI WorldCom object to each and every interrogatory and instruction to the extent that such interrogatory or instruction calls for information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

5. AT&T/MCI WorldCom object 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 AT&T/MCI WorldCom in response to GTEFL's interrogatories will be provided subject to, and without waiver of, the foregoing objection.

6. AT&T/MCI WorldCom object 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. AT&T/MCI WorldCom will attempt to note each instance where this objection applies.

7. AT&T/MCI WorldCom object to GTEFL's general instructions, definitions or specific discovery requests insofar as they seek to impose obligations on AT&T/MCI WorldCom which exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

8. AT&T/MCI WorldCom object to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

9. AT&T/ MCI WorldCom object to each and every interrogatory, general instruction, or definition insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

10. AT&T/MCI WorldCom object 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 GTEFL's interrogatories request proprietary confidential business information which is not subject to the "trade secrets" privilege, AT&T/MCI WorldCom will make such information available to counsel for GTEFL 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, AT&T/MCI WorldCom enter the following specific objections with respect to GTEFL's interrogatories:

**INTERROGATORY NO. 1:** In his Direct Testimony in this proceeding, John I. Hirshleifer uses book value weights in calculating his proposed capital structure for GTE and BellSouth. He notes that "there remains a debate among academics, practitioners, and forensic experts regarding the choice between book and market weights." (Hirschleifer Direct Testimony at 33). With regard to Mr. Hirshleifer's testimony:

- a. Please provide the names and professional affiliations of the academics, practitioners, forensic experts, or others who support use of book value weights in determining a company's capital structure.
- b. Please provide the names of treatises, articles, books, and other documents supporting the use of book value weights in determining a company's capital structure.

**OBJECTION:** AT&T/MCI WorldCom object to Interrogatory No. 1 to the extent that the request is overly broad, unduly burdensome, and excessively time consuming as written.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U.S. Mail, hand delivered (\*) or Federal Express (\*\*) this 26th day of June, 2000.

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into pricing of )  
unbundled network elements )  
\_\_\_\_\_ )

Docket No. 990649-TP

Filed: June 26, 2000

**AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC. AND MCI  
WORLD COM INC.'S OBJECTIONS TO GTE FLORIDA INCORPORATED  
FIRST REQUEST FOR JOINT PRODUCTION OF DOCUMENTS**

AT&T Communications of the Southern States, Inc. and MCI WorldCom, Inc., and its operating subsidiaries (collectively "AT&T/MCI 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 submit the following Objections to GTE Florida Incorporated's (hereinafter "GTEFL") First Request for Joint Production of Documents.

**The Objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the five-day requirement set forth in Order No. PSC-00-2015-PCO-TP issued by the Florida Public Service Commission (hereinafter the "Commission") in the above-referenced docket on June 8, 2000. Should additional grounds for objection be discovered as AT&T/MCI WorldCom prepare their Answers to the above-referenced discovery request, AT&T/MCI WorldCom reserve the right to supplement, revise, or modify its objections at the time that they serve their Answers on GTEFL. Moreover, should AT&T/MCI WorldCom determine that a Protective Order is necessary with respect to any of the material requested by GTEFL, AT&T/MCI WorldCom reserve the right to file a motion with the Commission seeking such an order at the time that they serve their Answers on GTEFL.**

## General Objections

AT&T/MCI WorldCom make the following General Objections to GTEFL's First Request for Joint Production of Documents which will be incorporated by reference into the specific Responses when Responses are served on GTEFL.

1. AT&T/MCI WorldCom object to GTEFL's First Request for Joint Production of Documents to the extent that it is overly broad, unduly burdensome, oppressive, not permitted by applicable discovery rules, and would require AT&T/MCI WorldCom to disclose information which is privileged.

2. AT&T/MCI WorldCom have interpreted GTEFL's requests to apply to their regulated intrastate operations in Florida and will limit their Responses 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, AT&T/MCI WorldCom object to such request as irrelevant, overly broad, unduly burdensome, and oppressive.

3. AT&T/MCI WorldCom object 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. AT&T/MCI WorldCom object 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 Responses provided by AT&T/MCI WorldCom in response to GTEFL's requests will be provided subject to, and without waiver of, the foregoing objection.

5. AT&T/MCI WorldCom object 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. AT&T/MCI WorldCom will attempt to note each instance where this objection applies.

6. AT&T/MCI WorldCom object to GTEFL's general instructions, definitions or specific discovery requests insofar as they seek to impose obligations on AT&T/MCI WorldCom which exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

7. AT&T/MCI WorldCom object to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

8. AT&T/MCI WorldCom object to each and every request, general instruction, or definition insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. AT&T/MCI WorldCom object 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 GTEFL's requests seek proprietary confidential business information which is not the subject of the "trade secrets" privilege, AT&T/MCI WorldCom will make such information available to counsel for GTEFL pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

10. AT&T/MCI WorldCom are large corporations with employees located in many different locations in Florida and in other states. In the course of their business, AT&T/MCI WorldCom create countless documents that are not subject to Florida Public



Service Commission or FCC retention of records requirements. These documents are kept in numerous locations and are frequently moved from site to site as employees change jobs or as the business is reorganized. Rather, these responses will provide all of the information obtained by AT&T/MCI WorldCom after a reasonable and diligent search conducted in connection with this discovery request. AT&T/MCI WorldCom will comply with GTEFL's request that a search be conducted of those files that are reasonably expected to contain the requested information. To the extent that the discovery request purports to require more, AT&T/MCI WorldCom object on the grounds that compliance would impose an undue burden or expense.

11. AT&T objects to the definitions of "AT&T" to the extent that such definitions seek to impose an obligation on AT&T Communications of the Southern States, Inc. 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 AT&T Communications of the Southern States, Inc. which is the entity certificated to provide regulated telecommunications services in Florida and which is a party to this docket. All references to "AT&T" in responding to GTEFL's requests should be taken to mean AT&T Communications of the Southern States, Inc.

12. MCI WorldCom objects to the definitions of "MCI" 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 MCI WorldCom Inc.'s certificated entities that provide regulated telecommunications services in Florida and are applicable to this docket.

13. AT&T/MCI WorldCom object to the definitions of "you" and "your" to the extent that such definitions seek to impose an obligation on AT&T Communications of the Southern States, Inc. and MCI WorldCom, Inc. and its operating subsidiaries certificated in Florida, 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 the AT&T Communications of the Southern States, Inc. and MCI WorldCom, Inc. operating subsidiaries that are certificated to provide regulated telecommunications services in Florida.

#### Objections to Specific Requests

Subject to, and without waiver of, the foregoing general objections, AT&T/MCI WorldCom enter the following specific objections with respect to GTEFL's requests:

**REQUEST NO. 1:** Please provide all of the documents named in response to joint interrogatory 1(b) in GTEFL's First Set of Joint Interrogatories to AT&T/MCI.

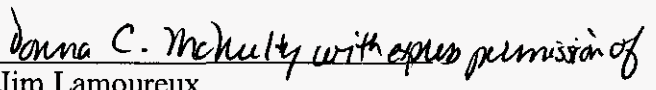
**OBJECTION:** AT&T/MCI WorldCom object to Production of Document Request No. 1 to the extent that the request is overly broad, unduly burdensome, and excessively time consuming as written.

Respectfully submitted,

  
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I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U.S. Mail, hand delivered (\*) or Federal Express (\*\*) this 26th day of June, 2000.

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