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August 27, 2002

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Blanca Bayó Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Notice of Service -- Docket No. 020129-TP

Dear Ms. Bayó:

MCI WorldCom, Inc. hereby gives notice that it has today served its Notice of Service of its Responses to Staff's 1st Set of Interrogatories and its Responses to Staff's 1st Request for Production of Documents.

By copy of this letter, these responses are being furnished to the parties to this docket.

Very truly yours,

Gary V Perko

AUS ____ cc: Parties of Record CMP ___ COM ___ CTR __ ECR __ GCL __ OPC __ MMS __ SEC ___

RECEIVED & FILED

FPSC-BUREAU OF RECORDS Response to

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint petition of US LEC of Florida, Inc,.)	Docket No. 020129-TP
Time Warner Telecom of Florida, L.P., and)	
ITC^DeltaCom Communications objecting to)	Filed: August 27, 2002
and requesting suspension of proposed CCS7)	
Access Arrangement tariff filed by BellSouth)	
Telecommunications, Inc.)	
	_)	

WORLDCOM'S RESPONSES TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

MCI WorldCom Communications, Inc. ("WorldCom"), pursuant to Rule 28-106.206, Florida Administrative Code and Rules 1.340 and 1.280, Florida Rules of Civil Procedure, hereby submit the following Responses to Staff's First Request for Production of Documents (Nos. 1 – 4) to MCI WorldCom Communications, Inc.

RESPONSES TO SPECIFIC REQUESTS

REQUEST NO. 1: Please produce any and all documents that support your response to Interrogatories 1(c) and 1(d).

RESPONSE: See Attachment 1.

REQUEST NO. 2: Please produce any and all documents that support your response to Interrogatory 4(b).

RESPONSE: There are no documents responsive to this request.

REQUEST NO. 3: Please produce any and all documents to support your response to Interrogatory 5.

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RESPONSE: See Attachment 1.

REQUEST NO. 4: Please produce any and all documents identified in your response to Interrogatory 7(b).

RESPONSE: See Attachment 2.

Respectfully submitted,

Donna Canzano McNalty

WorldCom, Inc.

325 John Knox Road, Ste. 105

Tallahassee, FL 32303

(850) 422-1254

and

Dulaney L. O'Roark III WorldCom, Inc. Six Concourse Parkway Suite 3200 Atlanta, GA 30328 (770) 284-5498

Attorneys for WorldCom, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. mail and/or hand deliver (*) to all known parties of record in Docket No. 020129-TP this 27th day of August, 2002.

Jason Fudge*
Adam Teitzman
FL Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

BellSouth Telecommunications, Inc. Ms. Nancy B. White/James Meza III c/o Ms. Nancy H. Sims 150 South Monroe Street, Suite 400 Tallahassee, FL 32301-1556

Florida Cable Telecommunications Assoc., Inc. Michael A. Gross 246 E. 6th Avenue, Suite 100 Tallahassee, FL 32303

ITC^DeltaCom Ms. Nanette S. Edwards 4092 South Memorial Parkway Huntsville, AL 35802-4343

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Time Warner Telecom of Florida, L.P. Ms. Carolyn Marek Time Warner Telecom 233 Bramerton Court Franklin, TN 37069-4002

US LEC of Florida Inc. Mr. Greg Lunsford 6801 Morrison Blvd. Charlotte, NC 28211-3599

Attorney