

AUSLEY & McMULLEN

ATTORNEYS AND COUNSELORS AT LAW

227 SOUTH CALHOUN STREET
P.O. BOX 391 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
(850) 224-9115 FAX (850) 222-7560

ORIGINAL

RECEIVED-FPSC
02 JAN -2 PM 4:32
COMMISSION
CLERK

January 2, 2002

BY HAND DELIVERY

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

Re: Docket No. 990649B-TP

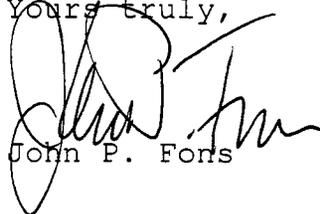
Dear Ms. Bayo:

Today, Sprint served its General Objections to Staff's Third Set of Interrogatories, dated December 21, 2001.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Yours truly,



John P. Fons

Enclosures

cc: All parties of record

h:\data\jpf\utd\990649b\letters\bayo obj.doc

APP _____
CAF _____
CMP _____
COM 5 _____
CTR _____
ECR _____
EG _____
JPC _____
JAI _____
JGO _____
JEC 1 _____
JER _____
JTH _____

RECEIVED & FILED

Richard
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

00040 JAN-28

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into
Pricing of Unbundled Network
Elements

DOCKET NO. 990649B-TP
FILED: January 2, 2001

**SPRINT'S (GENERAL) OBJECTIONS TO
STAFF'S THIRD SET OF INTERROGATORIES**

Sprint-Florida, Incorporated ("Sprint"), pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.340 and 1.280, Florida Rules of Civil Procedure, hereby files the following General Objections to the Staff of the Florida Public Service Commission's ("Staff's") Third Set of Interrogatories, dated December 21, 2001.

The objections stated herein are preliminary in nature and are made at this time to comply with the 10-day requirement set forth in Order No. PSC-01-1904-PCO-TP, issued September 24, 2001, by the Florida Public Service Commission ("Commission"). Should additional grounds for objection be discovered as Sprint prepares its answers to the above-referenced interrogatories, Sprint reserves the right to supplement, revise, or modify its objections at the time it serves its responses.

1. Sprint objects to the interrogatories to the extent they seek to impose an obligation on Sprint to respond on behalf of subsidiaries, affiliates, or other persons that are not

DOCUMENT NUMBER-DATE

00040 JAN-28

FPSC-COMMISSION CLERK

parties to this case on the grounds that such interrogatories are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. Sprint objects to the interrogatories to the extent that are intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission. Sprint objects to such interrogatories as being irrelevant, overly broad, unduly burdensome, and oppressive.

3. Sprint objects to each and every interrogatory 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. Sprint objects to each and every interrogatory insofar as the interrogatories are vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these interrogatories. Any answers provided by Sprint in response to the interrogatories will be provided subject to, and without waiver of, the foregoing objection.

5. Sprint objects to each and every interrogatory insofar as it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of

this action. Sprint will attempt to note in its responses each instance where this objection applies.

6. Sprint objects to providing information to the extent that such information is already in the public record before the Commission.

7. Sprint objects to Staff's discovery requests, instructions and definitions, insofar as they seek to impose obligations on Sprint that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

8. Sprint objects to each and every interrogatory, insofar as any of them are unduly burdensome, expensive, oppressive, or excessively time consuming as written.

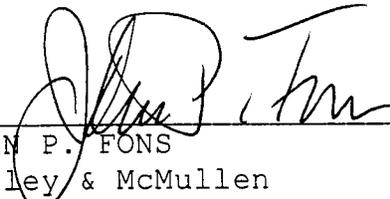
9. Sprint is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, Sprint creates countless documents that are not subject to Commission or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been identified in response to these requests. Sprint will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the requests purport to require

more, Sprint objects on the grounds that compliance would impose an undue burden or expense.

Respectfully submitted this 2nd day of January, 2002.

SUSAN MASTERTON
Sprint-Florida, Inc.
P. O. Box 2214
Tallahassee, Florida 32316
(850) 847-0244

and



JOHN P. FONS
Ausley & McMullen
Post Office Box 391
Tallahassee, Florida 32302
(850) 224-9115

ATTORNEYS FOR SPRINT-FLORIDA, INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by e-mail transmission and hand delivery (*) or U. S. Mail this 2nd day of January, 2002, to the following:

Beth Keating *
Jason Fudge
Division of Legal Services
Florida Public Service Comm.
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Nancy B. White
c/o Nancy Sims
BellSouth Telecommunications
150 S. Monroe St., Suite 400
Tallahassee, FL 32301-1556

Anne Marsh *
Florida Public Service Comm.
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Hope G. Colantonio
Cleartel Communications, Inc.
1255 22nd St., N.W., 6th Floor
Washington, DC 20037

ALLTEL Communications
Services, Inc.
Bettye Willis
One Allied Drive
Little Road, AR 72203-2177

Jim Lamoureaux
AT&T Communications
1200 Peachtree Street, N.E.
Room 8068
Atlanta, GA 30309

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

Z-Tel Communications, Inc.
Joseph McGlothlin
McWhirter, Reeves, et al.
117 South Gadsden Street
Tallahassee, FL 32301

Florida Digital Network, Inc.
390 North Orange Ave., Suite 2000
Orlando, FL 32801

Catherine F. Boone
COVAD
10 Glenlake Parkway
Suite 650
Atlanta, GA 30328

Kimberly Caswell
Verizon
P. O. Box 110, FLTC0007
Tampa, FL 33601-0110

Charles Beck
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street., Room 812
Tallahassee, FL 32399-1400

Broadslate Networks of Fla., Inc.
c/o John Spilman
675 Peter Jefferson Pkwy, Ste 310
Charlottesville, VA 22911

Scott Sapperstein
Intermedia Communications, Inc.
One Intermedia Way (MC:FLT HQ3)
Tampa, FL 33647-1752

Mark Buechele
Supra Telecom
Koger Cntr-Ellis Bldg, Ste 200
1311 Executive Center Drive
Tallahassee, FL 33201-5027

Network Access Solutions
Corporation
100 Carpenter Drive, Suite 206
Sterling, VA 20164

Donna C. McNulty
MCI WorldCom
325 John Knox Road, Suite 105
Tallahassee, FL 32303-4131

Floyd R. Self
Messer, Caparello & Self
P. O. Box 1876
Tallahassee, FL 32302

J. Jeffrey Wahlen
Ausley & McMullen
P. O. Box 391
Tallahassee, FL 32302



Attorney

h:\data\jpf\utd\990649b\pleadings\objections to 3rd interrogs.doc