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February 26, 1996

IN REPLY REFER TO:  
Tallahassee

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FILE COPY**

**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: Resolution of Petition to Establish Non  
Discriminatory Rates, Terms, and Conditions  
for Interconnection Involving Local Exchange  
Companies and Alternative Local Exchange  
Companies pursuant to Section 364.162,  
Florida Statutes - Docket No. 950985-TP

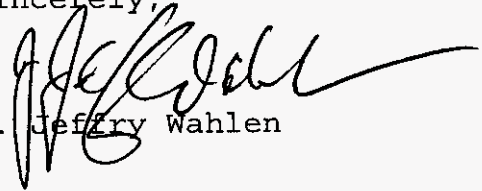
Dear Ms. Bayo:

Enclosed for filing in the above-styled docket are the original and fifteen (15) copies of Central Telephone Company of Florida and United Telephone Company of Florida's Objections to FCTA's First Request for Production of Documents and Motion for Protective Order.

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.

Sincerely,

  
J. Jeffrey Wahlen

- ACK
- AFA
- APP
- CAF
- CMU
- CTR
- EAG
- LEG
- LIN
- OPC
- RCH
- SEC
- WAS
- OTH

JJW/csu  
Enclosures  
cc: All parties of record

**RECEIVED & FILED**  
*ma*  
**FPSC-BUREAU OF RECORDS**

DOCUMENT NUMBER-DATE  
**02322 FEB 26 1996**  
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of Petition to ) DOCKET NO. 950985-TP  
Establish Non Discriminatory Rates,) Filed: 02/26/96  
Terms, and Conditions for Inter- )  
connection Involving Local Exchange )  
Companies and Alternative Local )  
Exchange Companies pursuant to )  
Section 364.162, Florida Statutes )  
\_\_\_\_\_ )

**CENTRAL TELEPHONE COMPANY OF FLORIDA AND  
UNITED TELEPHONE COMPANY OF FLORIDA'S  
OBJECTIONS TO FCTA'S FIRST REQUEST FOR PRODUCTION  
OF DOCUMENTS AND MOTION FOR PROTECTIVE ORDER**

United Telephone Company of Florida ("Sprint/United") and Central Telephone Company of Florida ("Sprint/Centel") (collectively "Sprint-United/Centel" or the "Companies"), pursuant to Rule 25-22.034, Florida Administrative Code, Florida Rule of Civil Procedure 1.340, and the Procedural Order in this Docket, hereby submit the following Objections and Motion for Protective Order with respect to the Florida Cable Telecommunications Association, Inc.'s ("FCTA") First Request for Production of Documents ("FCTA's First POD"), which was served by hand delivery on February 16, 1996.

**Preface**

The objections are being made for the purpose of complying with the Order on Prehearing Procedure in this docket. The Companies have made a good faith effort to identify any and all objections they may have to FCTA's First POD, but reserve the

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right to raise additional objection up to the time of their responses if the need for additional objections becomes apparent while preparing the responses. If it becomes necessary to raise additional objections, the Companies will promptly file those objections and notify counsel for FCTA of the basis for the objection.

**General Objections of FCTA's First POD**

The Companies make the following general objections to FCTA's First POD. These general objections apply to each of the individual requests in FCTA's First POD, whether or not a specific objection is raised, and to FCTA's First POD in its entirety, and are incorporated in the specific objections below as though fully set forth therein.

1. The Companies have interpreted FCTA's First POD to apply to the Companies' 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 the Florida intrastate operations subject to the jurisdiction of the Commission, the Companies object on the basis that such requests are irrelevant, overly broad, unduly burdensome and oppressive.

2. The Companies object to each and every request to the extent that such requests call for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege or other applicable privilege. To the extent that the Companies identify privileged information during the

preparation of the responses to FCTA's First POD, they will, without waiving any applicable privilege, disclose the nature of the information and the basis for the claim of privilege to counsel for FCTA.

3. The Companies object to each and every request insofar as the requests are vague, ambiguous, overly broad, duplicative, imprecise or utilize terms that are subject to multiple interpretations but are not properly defined or explained for purposes of the requests. Any response provided by the Companies will be provided subject to, and without waiver of, the foregoing objection.

4. The Companies object to each and every request insofar as the requests are not reasonably calculated to lead to the discovery of admissible evidence, are not relevant to the subject matter of this action, and are beyond the scope of discovery as described in Florida Rule of Civil Procedure 1.280. The Companies will attempt to note each instance where this objection applies.

5. The Companies object to producing responses, documents, records and information to the extent that such information is already in the public record before the Florida Public Service Commission, or is equally available to FCTA from some other source.

6. The Companies object to each and every request, and all of the requests taken together, insofar as they are unduly

burdensome, expensive, oppressive, or excessively time-consuming to respond to as written.

7. The Companies 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 the requests seek proprietary confidential business information which is not subject to the "trade secrets" privilege, the Companies will make such information available to counsel for FCTA pursuant to a mutually acceptable Protective Agreement, subject to any other general or specific objections contained herein. The Companies have attempted to identify all instances where confidential information has been requested, but reserve the right to claim additional information as confidential if the need to do so becomes apparent while preparing the responses to FCTA's First POD.


**Specific Objections to FCTA's First POD**

1. The Companies object to Request No. 1 on grounds that the documents responsive to these requests, if any, will likely contain proprietary confidential business information. To the extent the Companies have documents, the Companies will provide the documents responsive to this request to FCTA on a confidential basis pursuant to a mutually acceptable non-disclosure agreement.

Motion for Protective Order

The Companies submit their objections to FCTA's First POD pursuant to the authority contained in Slatnik v. Leadership Housing Systems of Florida, Inc., 368 So.2d 79 (Fla. 3d DCA 1979). To the extent that a Motion for Protective Order is required, the objections set forth herein are to be construed as a request for protective order.

DATED this 26th day of February, 1996.

  
\_\_\_\_\_  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail or hand delivery (\*) this 26th day of February, 1996, to the following:

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