

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth's
Entry into InterLATA Services
Pursuant to Section 271 of the Federal
Telecommunications Act of 1996

Docket No. 960786-TL
Filed: November 15, 1996

**SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP'S
OBJECTIONS TO BELL SOUTH TELECOMMUNICATION'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Sprint Communications Company Limited Partnership ("Sprint"),
by and through its undersigned counsel, and pursuant to Rules 25-
22.034 and 25-22.035, Florida Administrative Code, and Rules 1.340
and 1.280(b), Fla. R. Civ. P., hereby submits its objections to the
First Request for Production of Documents to Sprint filed by
BellSouth Telecommunications, Inc. ("BellSouth").

General Objections

Sprint makes the following general objections to BellSouth's
first request for production of documents which will be
incorporated by reference into Sprint's specific response when its
answers are served on BellSouth.

1. Sprint objects to the request to the extent that such
request seeks to impose an obligation on Sprint to respond on
behalf of subsidiaries, affiliates or other persons or entities
that are not parties to this case on the grounds that such requests
are overly broad, unduly burdensome, oppressive, and not permitted
by applicable discovery rules.

2. Sprint has interpreted BellSouth's request to apply to
Sprint's regulated intrastate operations in Florida and will limit
its answers accordingly. To the extent that any request is

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intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission, Sprint objects to such request as irrelevant, overly broad, unduly burdensome, and oppressive.

3. Sprint objects to each and every request 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. Sprint 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 documents provided by Sprint in response to BellSouth's request will be provided subject to, and without waiver of, the foregoing objection.

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

6. Sprint objects to BellSouth's discovery requests, instructions and definitions, insofar as they seek to impose obligations on Sprint which exceed the requirements of the Florida Rules of Civil Procedure or Florida law, particularly Instruction (X).

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

8. Sprint objects to each and every request insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written to prepare.

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

Objections to Specific Requests

Subject to, and without waiver of, the foregoing general objections, Sprint enters the following specific objections with respect to BellSouth's requests for production of documents:

Request Nos. 1 - 30: Pursuant to the general objections stated above, Sprint objects to these requests on the grounds that the documents sought pertain to information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence related to the issue of whether BellSouth has met or will be able to meet the requirements of Section 271 of the Telecommunications Act of 1996. As to all requests, Sprint further

objects on the basis that the discovery seeks "trade secrets" and proprietary confidential business information; Sprint incorporates paragraph 9 of its general objections.

DATED this 15th day of November, 1996.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U.S. mail on this 15th day of November 1996, to the following:

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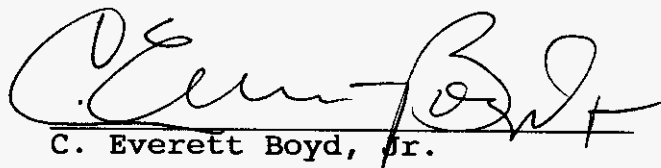
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