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Box 2214
Tallahassee, Florida 32316

July 16, 1997

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. 970281-TL

Dear Ms. Bayo:

Enclosed is an original and fifteen copies of Sprint-Florida Incorporated Responses and Objections to AT&T Communications of the Southern States, Inc.'s First Set of Interrogatories and First Request for Production of Documents dated June 25, 1997, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served on the parties shown on the attached Certificate of Service.

ACK Sincerely,

AFA 2

APP
CAF Charles J. Rehwinkel

CMD Shelley CJR/th

CTR Enclosures

EAG
LEG 5 cc: All Parties of Record

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EPSC-RECORDS/REPORTING

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re establishment of)
intrastate implementation)
requirements governing federally)
mandated deregulation of local)
exchange company pay phones)

Docket No. 970281-TL

Filed: June 30, 1997

**SPRINT-FLORIDA, INCORPORATED'S OBJECTIONS AND
RESPONSE TO AT&T'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-3)
AND FIRST REQUEST FOR INTERROGATORIES (NOS. 1-3)**

Sprint-Florida, Incorporated. (hereinafter "Sprint-Florida"), pursuant to Rules 25-22.034 and 25-22.035, Florida Administrative Code and Rules 1:350 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following Response and Objections to AT&T Communications of the Southern States, Inc.'s (hereinafter "AT&T").

General Objections

Sprint-Florida makes the following General Objections to AT&T's First Request for Production of Documents and Interrogatories which will be incorporated by reference into Sprint-Florida's specific responses when its Responses are served on AT&T.

1. Sprint-Florida objects to paragraph 4 of the "Definitions and Instructions" section of the Requests for Production of Documents and Interrogatories to the extent that the definitions of "you", "your", "Company" or "Sprint-Florida" seek to impose an obligation on Sprint-Florida 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, responses will be provided on behalf of Sprint-Florida which is the entity certificated to provide regulated telecommunications services in Florida and which is a party to this docket. All references to "United Telephone, United or Centel" in responding to the requests for Production of Documents and Interrogatories should be taken to mean Sprint-Florida..

2. Sprint-Florida has interpreted AT&T's requests to apply to Sprint-Florida'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, Sprint-Florida objects to such request as irrelevant, overly broad, unduly burdensome, and oppressive.

3. Sprint-Florida objects 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. Sprint-Florida 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 Sprint-Florida in response to these requests will be provided subject to, and without waiver of, the foregoing objection.

4. Sprint-Florida 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-Florida will attempt to note each instance where this objection applies.

5. Sprint-Florida objects to AT&T's general instructions, definitions or specific discovery requests insofar as they seek to impose obligations on Sprint-Florida which exceed the requirements of the Florida Rules of Civil Procedure or Florida law. Sprint-Florida objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission. Sprint-Florida objects to each and every request, general instruction, or definition insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

6. Sprint-Florida 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 the requests seek proprietary confidential business information which is not the subject of the "trade secrets" privilege, Sprint-Florida will make such information available to counsel for AT&T pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

7. Sprint-Florida is a large corporation with employees located in many different locations in Florida. In the course of its business, Sprint-Florida 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. Therefore, it is possible that every document may not be provided in response to these discovery requests. Rather, these responses will provide all of the information obtained by Sprint-Florida after a reasonable and diligent search conducted in connection with this discovery request. Sprint-Florida is complying with AT&T's request that a search be conducted of those files that are reasonable expected to contain the requested information. To the extent that the discovery

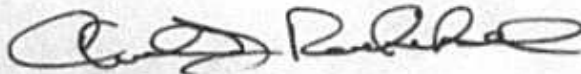
request purports to require more, Sprint-Florida objects on the grounds that compliance would impose an undue burden or expense.

8. Sprint-Florida also objects to discovery in this docket on the basis of the Motion for Expedited Ruling on Sprint-Florida's Status filed June 30, 1997.

9. Sprint-Florida objects to discovery in this docket that is directed to entities that are not parties to this docket, namely United Telephone Company of Florida and Central Telephone Company of Florida. These companies. Sprint-Florida, Incorporated is the certificated incumbent local exchange carrier and the provider of service in the areas formerly served by the aforementioned companies. Sprint-Florida will respond to discovery on the basis of the unified company that is subject to the jurisdiction of the commission, unless the discovery seeks information applicable to the period prior to January 1, 1997.

10. The preceding objections notwithstanding, Sprint-Florida has provided responses to AT&T's First Request for Production of Documents and Interrogatories (Nos. 1-3) to [Sprint-Florida]. See Attached.

Respectfully Submitted,



Charles J. Rehwinkel
General Attorney
Sprint-Florida, Incorporated
P.O. Box 2214
MC FLTLHO0107
Tallahassee, Florida 32301

INTERROGATORIES

INTERROGATORIES

Sprint-Florida, Incorporated
FPSC Docket No.970281-TL
AT&T's First Set of Interrogatories
June 25, 1997
Interrogatory No. 1

Request:

1. Provide the average monthly revenue per line (including flat rate plus any applicable usage charges) that the United regulated entity anticipates receiving from its deregulated payphone service provider operation for the use of payphone

1. Provide the average monthly revenue per line (including flat rate plus any applicable usage charges) that the Centel regulated entity anticipates receiving from its deregulated payphone service provider operation for the use of payphone access line service.

Response:

Sprint-Florida anticipates receiving approximately \$44.87 per line per month from the now deregulated payphone service provider operation that is made up of the pay stations of the LEC operations.

INFORMATION PROVIDED BY:

F. Ben Poag
Director, Tariffs and Regulatory
Management
1313 Blair Stone Road.
Tallahassee, Florida 32301
Sprint-Florida, Incorporated

FPSC Docket No.970281-TL
AT&T's First Set of Interrogatories
June 25, 1997
Interrogatory No. 2

Request:

2. Provide the number of payphone access lines that will be utilized by the deregulated United payphone operation.
2. Provide the number of payphone access lines that will be utilized by the deregulated Centel payphone operation.

Response:

The number of payphone lines that will be utilized by the payphone operations of the Sprint-Florida operations is approximately 8953.

INFORMATION PROVIDED BY:

F. Ben Poag
Director, Tariff's and Regulatory
Management
1313 Blair Stone Road.
Tallahassee, Florida 32301

Sprint-Florida, Incorporated
FPSC Docket No.970281-TL
AT&T's First Set of Interrogatories
June 25, 1997
Interrogatory No. 3

Request:

3. Provide the average monthly revenue per line (including flat rate plus any applicable usage charges) that United currently receives from private (non-affiliated) payphone providers for the use of United payphone access line services.

3. Provide the average monthly revenue per line (including flat rate plus any applicable usage charges) that Centel currently receives from private (non-affiliated) payphone providers for the use of Centel payphone access line services.

Response:

Sprint-Florida anticipates receiving approximately \$28.41 line per month from the non-affiliated payphone service providers for the use of the Sprint-Florida payphone access line services.

INFORMATION PROVIDED BY:

F. Ben Poag
Director, Tariffs and Regulatory
Management
1313 Blair Stone Road.
Tallahassee, Florida 32301

PRODUCTION OF DOCUMENTS

Sprint-Florida, Incorporated
FPSC Docket No.970281-TL
AT&T's First Request for P.O.D.
June 25, 1997
Production of Documents Requests 1-3

Request:

1. Provide a copy of all studies or documents that [Sprint-Florida] is relying upon to quantify the intrastate subsidy associated with its payphone operations.
2. Provide a copy of all workpapers supporting the development of the studies provided in response to Request No. 1 above.
3. Provide a copy of all documents that detail the assumptions, the inputs and the source of the inputs utilized in developing the studies provided in response to Request No. 1.

Response:

See attached (Provided to AT&T only)

STATE OF FLORIDA

COUNTY OF LEON

BEFORE ME, the undersigned authority, personally appeared
F. Ben Poag Jr., who being duly sworn deposes and says:

That he occupies the position of Director, Tariffs &
Regulatory and is the person who has furnished answers to these
interrogatories No. 1 through 3 and further says that said
answers are true and correct to the best of his knowledge and
belief.

WITNESS my hand and seal this 16th day of July,

A.D., 1997.

Signature F. Ben Poag Jr.
Benjamin J. Jensen

Notary Public

State of Florida

My Commission Expires:



Benjamin J. Jensen
MY COMMISSION # CC008700 EXPIRES
February 10, 2001
BONDED TRAVELERS FUND INSURANCE, INC.

**CERTIFICATE OF SERVICE
DOCKET NO.**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail this 16th day of July, 1997 to the following:

Richard D. Melson, Esq.
Hopping, Sams & Smith, P.A.
P. O. Box 6526
Tallahassee, Florida 32314

Michael J. Henry, Esq.
Martha P. McMillin, Esq.
MCI Telecommunications Corporation
780 Johnson Ferry Road, Suite 700
Atlanta, GA 30342

Monica Barone, Esq.
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-7704

Ms. Beverly Y. Menard
GTE Florida Incorporated
106 East College Avenue, Suite 1440
Tallahassee, Florida 32301-1440

BellSouth Telecommunications, Inc.
Robert G. Beatty
Nancy B. White
c/o Nancy H. Sims
150 so. Monroe Street, Suite 400
Tallahassee, Florida 32301

Ms. Harriet Eudy
ALLTEL Florida, Inc.
P.O. Box 550
Live Oak, FL 32060-3343

Mr. Bill Thomas
Gulf Telephone Company
P.O. Box 1007
Port St. Joe, FL 32457-1007

Mr. Robert M. Post, Jr.
Indiantown Telephone System, Inc.
P.O. Box 277
Tallahassee, Florida 34956-0277

Ms. Lynn G. Brewer
Northeast Florida Telephone
Company, Inc.
P.O. Box 485
Macclenny, Florida 32063-0485

Mr. Thomas McCabe
Quincy Telephone Company
P.O. Box 189
Quincy, Florida 32353-0189

Mr. John H. Vaughan
St. Joseph Telephone
& Telegraph Company
P.O. Box 220
Port St. Joe, Florida 32456-0220

Ms. Laurie A. Maffett
Frontier Communications
of the South, Inc.
180 S. Clinton Avenue
Rochester, N.Y. 14646-0400

Ms. Lynn B. Hall
Vista-United Telecommunications
P.O. Box 10180
Lake Buena Vista, Florida 32830-0180

Tracy Hatch
AT&T Communications of the
Southern States, Inc.
101 North Monroe Street
Tallahassee, Florida 32311



Charles J. Rehwinkel
Attorney for
Sprint-Florida, Inc.
P.O. Box 2214,
FTLHO0107
Tallahassee, FL 32316-2214
904/847-0244