

ORIGINAL



Susan S. Masterton
Attorney

Law/External Affairs
Post Office Box 2214
1313 Blair Stone Road
Tallahassee, FL 32316-2214
Mailstop FL.TL.H00107
Voice 850 599 1560
Fax 850 878 0777
susan.masterton@mail.sprint.com

March 3, 2003

Ms. Blanca S. Bayó, Director
Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

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COMMISSION
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Re: Docket No. 981834-TP & 990321-TP

Dear Ms. Bayó:

Enclosed for Filing on behalf of Sprint is the original and 15 copies of Sprint's General Objections to AT&T Communications of the Southern States, LLC's First Request for Production of Documents (No. 1-22) and First Request for First Set of Interrogatories (No. 1-4).

Copies are being served on the parties in this docket, pursuant to the attached Certificate of Service.

Please acknowledge receipt of this filing by stamping and initialing a copy of this letter and returning same to the courier. If you have any questions, please do not hesitate to call me at 850/599-1560.

Sincerely,

Susan S. Masterton

Enclosure

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CAF _____
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SEC 1
OTH Cover letter

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for Commission action to support local competition in BellSouth Telecommunications, Inc.'s service territory. DOCKET NO. 981834-TP

In re: Petition of ACI Corp. d/b/a Accelerated Connections, Inc. for generic investigation to ensure that BellSouth Telecommunications, Inc., Sprint-Florida, Incorporated, and GTE Florida Incorporated comply with obligation to provide alternative local exchange carriers with flexible, timely, and cost-efficient physical collocation. DOCKET NO. 990321-TP
Filed: March 3, 2003

**SPRINT -FLORIDA, INCORPORATED'S GENERAL OBJECTIONS TO
AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC's
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (1-22)
AND FIRST SET OF INTERROGATORIES (1-4)**

Sprint-Florida, Incorporated ("Sprint"), pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.340, 1.350 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following Objections to AT&T Communications of the Southern States, LLC's ("AT&T's") First Request for Production of Documents (1-22) and First Set of Interrogatories (1-4).

INTRODUCTION

The objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the ten-day requirement set forth in Order No. PSC-02-1513-PCO-TP ("Procedural Order") issued by the Florida Public Service Commission ("Commission") in the above-referenced docket. Should additional grounds for objection be discovered as Sprint prepares its responses to the above-referenced requests, Sprint reserves the right to supplement,

DOCUMENT NUMBER-DATE

02108 MAR-3 2003

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revise, or modify its objections at the time that it serves its responses on AT&T. Moreover, should Sprint determine that a Protective Order is necessary with respect to any of the material requested by AT&T, Sprint reserves the right to file a motion with the Commission seeking such an order at the time that it serves its answers and responses on AT&T.

GENERAL OBJECTIONS

Sprint makes the following General Objections to AT&T's First Request for Production of Documents (1-22) ("First POD") and First Set of Interrogatories (1-4) ("First IRR"). These general objections apply to each of the individual requests and interrogatories in the First POD and First IRR, respectively, and will be incorporated by reference into Sprint's responses and answers when they are served on AT&T.

1. Sprint objects to the requests to the extent that such requests seek to impose an obligation on Sprint to respond on behalf of subsidiaries, affiliates, or other persons 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 AT&T's requests to apply to Sprint'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 objects to such request to produce as irrelevant, overly broad, unduly burdensome, and oppressive.

3. Sprint objects to each and every request 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 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 to AT&T's requests 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 in its responses each instance where this objection applies.

6. Sprint objects to AT&T's discovery requests, instructions and definitions, insofar as they seek to impose obligation on Sprint that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

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

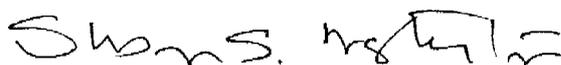
8. Sprint objects to each and every request, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

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 AT&T's requests proprietary confidential business information which is not subject to the "trade secrets" privilege, Sprint 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.

10. 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 will be provided in response to these discovery requests. Rather, Sprint's responses will provide, subject to any applicable objections, all of the information obtained by Sprint after a reasonable and diligent search conducted in connection with these requests. Sprint shall conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the discovery requests purport to require more, Sprint objects on the grounds that compliance would impose an undue burden or expense. To the extent that AT&T requests herein documents that have previously been produced to other parties in response to previous discovery, then without limiting any of the foregoing objections, Sprint incorporates herein by reference its objections to that previous discovery.

DATED this 3rd day of March, 2003.



SUSAN S. MASTERTON
P.O. Box 2214
Tallahassee, FL 32316-2214
(850) 599-1560 (phone)
(850) 878-0777 (fax)
susan.masterton@mail.sprint.com

ATTORNEY FOR SPRINT

**CERTIFICATE OF SERVICE
DOCKET NO. 981834-TP & 990321-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail or Hand Delivery* this 3rd day of March, 2003 to the following:

Wayne Knight, Esq.*
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0870

FCCA
c/o McWhirter Law Firm
Vicki Kaufman
117 S. Gadsden Street
Tallahassee, Florida 32301

Nancy B. White
c/o Nancy H. Sims
BellSouth Telecommunications, Inc.
150 S. Monroe Street Suite 400
Tallahassee, Florida 32301-1556

Ausley Law Firm
Jeff Wahlen
Post Office Box 391
Tallahassee, Florida 32302

Alltel Communications Services, Inc.
Bettye Willis
One Allied Drive
Little Rock, AR 72203-2177

MCI WorldCom Communications, Inc.
Donna McNulty
1203 Governors Square Blvd. Suite 201
Tallahassee, Florida 32301-2960

Hopping Law Firm
Rick Melson
Post Office Box 6526
Tallahassee, Florida 32314

Messer Law Firm
Floyd Self/Norman Horton
Post Office Box 1876
Tallahassee, Florida 32302

Pennington Law Firm
Peter Dunbar/Marc W. Dunbar
Post Office Box 1009
Tallahassee, Florida 32302

MediaOne Florida Telecommunications,
Inc.
c/o Laura L. Gallagher, P.A.
101 E. College Ave., Suite 302
Tallahassee, Florida 32301

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

AT&T Communications of the
Southern States, Inc.
Tracy W. Hatch
1200 Peachtree Street, NE Suite 8100
Atlanta, GA 30309

Time Warner Telecom
Carolyn Marek
233 Bramerton Court
Franklin, TN 37069

Katz, Kutter Law Firm
Charles Pellegrini/Patrick Wiggins
12th Floor
106 East College Avenue
Tallahassee, Florida 32301

Supra Telecommunications &
Information Systems, Inc.
Mark E. Buechele
2620 S.W. 27th Avenue
Miami, FL 33133

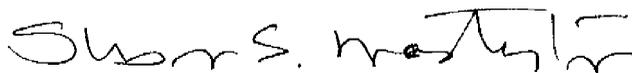
Verizon-Florida, Incorporated
Michelle Robinson
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110

ITC^DeltaCom Communications, Inc.
Nanette Edwards
Messer, Caparello & Self
Post Office Box 1876
Tallahassee, Florida 32302-1876

Network Telephone Corporation
Brent E. McMahan
815 South Palafox Street
Pensacola, FL 32501-5937

KMC Telecom, Inc.
Mr. John D. McLaughlin, Jr.
1755 North Brown Road
Lawrenceville, GA 30043-8119

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



Susan S. Masterton