



Susan S. Masterton Attorney

ORIGINAL

Law/External Affairs
Post Office Box 2214
1313 Blarr Stone Road
Tallahassee, FL 32316-2214
Mailstop FLTLH00107
Voice 850 599 1560
Fax 850 878 0777
susan.masterton@mail.sprint.com

March 20, 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

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

Dear Ms. Bayó:

Enclosed for Filing on behalf of Sprint are the original and one copy of

- Sprint's Notice of Service of Responses to Staff's First Request for Production of Documents (No. 1-4) and First Set of Interrogatories (No. 1-10).
- 2. Sprint's Notice of Service of Responses to Staff's Second Request for Production of Documents (No. 5-9).

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

has s. ma

Enclosure

RECEIVED & FILED

DOCUMENT NUMBER -DATE

02723 MAR 20 8

FPSC-BURGAU OF RECORDS

FPSC-CUMMISSION CLERK

DOCUMENT NUMBER - DATE

02724 MAR 20 8

FPSC-COMMISSION CLERK

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

I HEREBY CERTIFY that a true and correct copy of the foregoing was served Electronically and by U.S. Mail or Hand Delivery* this 20th 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

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

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

Pennington Law Firm Karen Camechis Post Office Box 1009 Tallahassee, Florida 32302

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

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

FCCA c/o McWhirter Law Firm Vicki Kaufman 117 S. Gadsden Street Tallahassee, Florida 32301 Ausley Law Firm
Jeff Wahlen
Post Office Box 391
Tallahassee, Florida 32302

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

Messer Law Firm Floyd Self/Tracy Hatch Post Office Box 1876 Tallahassee, Florida 32302

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

AT&T Communications of the Southern States, Inc. Virginia C. Tate 1200 Peachtree Street, NE Suite 8066 Atlanta, GA 30309

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

Verizon-Florida, Incorporated Richard Chapkis c/o David Chirstian 106 East College Avenue, Suite 810 Tallahassee, Florida 32301-7704

Covad Communications Company William H. Weber 1230 Peachtree Street, NE 19th Floor Atlanta, GA 30309-3574

JW >. 18 94

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

| Carriers for Commission action to support local competition in BellSouth Telecommunications, Inc.'s service territory. 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 | |
|---|-----------------|
| Telecommunications, Inc.'s service) territory. 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) | |
| territory.) Petition of ACI Corp. d/b/a Accelerated) Connections, Inc. for generic investigation to) Docke Ensure that BellSouth Telecommunications, Inc.,) Sprint-Florida, Incorporated, and GTE) Florida Incorporated comply with obligation) | |
| 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 Docke | |
| Connections, Inc. for generic investigation to) Docke Ensure that BellSouth Telecommunications, Inc.,) Sprint-Florida, Incorporated, and GTE) Florida Incorporated comply with obligation) | |
| Ensure that BellSouth Telecommunications, Inc., Sprint-Florida, Incorporated, and GTE Florida Incorporated comply with obligation) | |
| Sprint-Florida, Incorporated, and GTE) Florida Incorporated comply with obligation) | t No. 990321-TP |
| Florida Incorporated comply with obligation) | |
| • | |
| to provide alternative local exchange | |
| F | |
| carriers with flexible, timely, and cost-efficient) | |
| physical collocation.) Date: | March 20, 2003 |
|) | |

SPRINT'S NOTICE OF SERVICE OF RESPONSES TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 1-4) AND FIRST SET OF INTERROGATORIES (NO. 1-10)

NOTICE IS HEREBY GIVEN that a copy of the responses of Sprint-Florida, Incorporated, hereinafter ("Sprint") to the Staff of the Florida Public Service Commission, hereinafter ("Staff"), First Request for Production of Documents (No. 1-4) and First Set of Interrogatories (No. 1-10), which was legally propounded by Staff, on February 25, 2003 was submitted Electronically and via U.S. Mail to Beth Keating, Staff Counsel, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850. Copies of this Notice have been served on the parties to this docket pursuant to the attached Certificate of Service.

DOCUMENT HI MALL DATE

RESPECTFULLY SUBMITTED this 20th day of March, 2003.

Susan S. Masterton

P.O. Box 2214

MS: FLTLHO0107

Tallahassee, Florida 32316

850/599-1560

ATTORNEY FOR SPRINT