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March 24, 2003

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COMMISSION
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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 15 copies of Sprint-Florida, Incorporated's Objections to Staff's Second Set of Interrogatories (No. 11-26) and Staff's Third Request for Production of Documents (No. 10-21).

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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**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 this 24th day of March, 2003 to the following:

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Tallahassee, Florida 32399-0870

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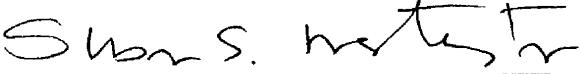
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Susan S. Masterton

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 24, 2003

**SPRINT -FLORIDA, INCORPORATED'S OBJECTIONS TO
STAFF'S SECOND SET OF INTERROGATORIES (NOS. 11-26) AND
STAFF'S THIRD REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 10-21)**

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 Staff's Second Set of Interrogatories (Nos. 11-26) and Third Request for Production of Documents (Nos. 10-21).

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, revise, or modify its objections at the time that it serves its responses on Staff. Moreover, should

Sprint determine that a Protective Order is necessary with respect to any of the material requested by Staff, 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 Staff.

GENERAL OBJECTIONS

Sprint makes the following General Objections to Staff's Second Set of Interrogatories (Nos. 11-26) (Second IRR) and Third Request for Production of Documents (Nos. 10-21) (Third POD). These general objections apply to each of the individual requests and interrogatories in the Second IRR and Third POD, respectively, and will be incorporated by reference into Sprint's responses and answers when they are served on Staff.

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 Staff'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 Staff'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 Staff'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 Staff's requests proprietary confidential business information which is not subject to the "trade secrets" privilege, Sprint will make such information available in accordance with the protective order in this docket issued by the Commission, Order No. PSC-03-0222-PCO-TP, 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 Staff 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.

SPECIFIC OBJECTIONS: SECOND IRR

In addition to the foregoing general objections, Sprint raises the following specific objections to the following individual interrogatories in the Second IRR:

25. c. Currently in Florida, or at any time in the past, has Sprint leased space in a CO to another firm that is not the result of a regulatory mandate? Include in your response the CLLI code, name and address for each CO. For each location:

- 1. To whom is (was) the space leased?**
- 2. Describe and provide the rates, terms, and conditions of the lease.**
- 3. What are (were) the effective dates of the lease?**
- 4. How long has (did) Sprint let out each location?**
- 5. What type of equipment or personnel is (was) this space used for?**

Explain.

Objection: In addition to its general objections, which are incorporated herein by reference, Sprint objects to the request in subpart c. of this Interrogatory as being overly broad and unduly burdensome, to the extent it asks for information relative to Sprint's COs "at any time in the past." Sprint has approximately 134 COs in Florida. To search Sprint's records for the historical information requested would require a manual search for and interpretation of records that are not centrally stored or readily accessible for each of these COs. Once the historical records are identified through manual search to ascertain those "unrelated to a regulatory mandate" each lease would need to be manually reviewed to answer the questions posed in the interrogatory. This manual process would take a considerable amount of time and manpower resources to complete.

SPECIFIC OBJECTIONS: THIRD POD

In addition to the foregoing general objections, Sprint raises the following specific objections to the following individual requests in the Third POD:

- 15. Provide electronic copies of the architectural drawings for all Sprint COs in the state of Florida where collocation has occurred. To the extent possible provide these files on compact disc(s) as AutoCAD files (e.g. CLLIcode.dwg or Coname.dwg)**
- a. Cross-reference Interrogatory 18. To the extent that this material is not already included in your previous response, provide electronic copies of the floor plan drawings analyzed to determine the shared support and growth space factor.**

Objection: In addition to its general objections, which are incorporated herein by reference, Sprint objects to this Interrogatory as'overly broad and unduly burdensome. Sprint does not maintain electronically architectural plans for every CO where collocation has occurred. The

decision to expend the resources necessary to produce and maintain architectural drawings in the electronic format requested is unrelated to collocation activities and, therefore, these records may not exist for all of the Cos requested by staff.

In addition, Sprint does not maintain floor plan drawings for its COs in an electronic format. Rather, the information relative to a particular CO is maintained in several electronic files that have to be pulled together and merged in order to produce hard copies of the floor plans. The Rules of Civil Procedure do not require Sprint to create documents to respond to a request for production and, in any event, Sprint is unable to produce the floor plans in an electronic format. Sprint previously has provided paper copies of the floor plans for the referenced COs in response to AT&T's First Request for Production of Documents No. 10, copies of which have been provided to staff.

DATED this 24th day of March 2003.

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