

WILMER, CUTLER & PICKERING

2445 M STREET, N.W.

WASHINGTON, DC 20037-1420

TELEPHONE (202) 663-6000

FACSIMILE (202) 663-6363

WWW.WILMER.COM

April 11, 2003

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

COMMISSION
CLERK

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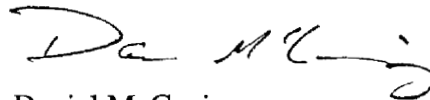
Re: Docket Nos. 981834-TP and 990321-TP (Generic Collocation)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of Verizon Florida Inc.'s Initial Objections to Staff's Fifth Set of Interrogatories and Fifth Request for Production of Documents, 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 to the parties shown on the attached Certificate of Service.

Sincerely,



Daniel McCuaig

cc: All Parties of Record
Charles Schubart

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DIVISION OF RECORDS

DOCUMENT NUMBER-DATE

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CERTIFICATE OF SERVICE
Docket No. 981834-TP and 990321 TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail this 11th day of April, 2003 (with service via First Class U.S. Mail or Facsimile to follow) to the following:

Beth Keating, Staff Counsel
C. Lee Fordham, Staff Counsel
Wayne Knight, Staff Counsel
Adam Teitzman, Staff Counsel
Andrew Maurey
Betty Gardner
Cheryl Bulecza-Banks
David Dowds
Jackie Schindler
Jason-Earl Brown
Laura King; Bob Casey
Pat Lee; Stephanie Cater
Paul Vickery
Pete Lester; Zoryana Ring
Sally Simmons
Shevie Brown
Todd Brown
Victor Mckay
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6212
Fax. No. (850) 413-6250
bkeating@psc.state.fl.us
cfordham@psc.state.fl.us
wknight@psc.state.fl.us
ateitzma@psc.state.fl.us
amaurey@psc.state.fl.us
bgardner@psc.state.fl.us
cbulecza@psc.state.fl.us
david.dowds@psc.state.fl.us
jschindl@psc.state.fl.us
jebrown@psc.state.fl.us
lking@psc.state.fl.us; bcasey@psc.state.fl.us
plee@psc.state.fl.us; scater@psc.state.fl.us
pvickery@psc.state.fl.us
plester@psc.state.fl.us; zring@psc.state.fl.us
sasimmon@psc.state.fl.us
sbbrown@psc.state.fl.us
tbrown@psc.state.fl.us
vmckay@psc.state.fl.us

Terry Monroe
Vice President, State Affairs
Competitive Telecomm. Assoc.
1900 M Street, N.W.
Suite 800
Washington, D.C. 20036
Tel. No. (202) 296-6650
Fax. No. (202) 296-7585
tmonroe@comptel.org

Marilyn H. Ash
MGC Communications, Inc.
3301 North Buffalo Drive
Las Vegas, Nevada 89129
Tel. No. (702) 310-8461
Fax. No. (702) 310-5689
mash@mgccom.com

J. Phillip Carver
Senior Attorney
Nancy Sims
Nancy White
Stan Greer
BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
Tel. No. (404) 335-0710
J.Carver@bellsouth.com
nancy.sims@bellsouth.com
nancy.white@bellsouth.com
stan.greer@bellsouth.com

Peter M. Dunbar, Esq.
Pennington, Moore, Wilkinson &
Dunbar, P.A.
Post Office Box 10095
Tallahassee, Florida 32302
Tel. No. (850) 222-3533
Fax. No. (850) 222-2126
pete@penningtonlawfirm.com

Carolyn Marek
Vice President of Regulatory Affairs
Southeast Region
Time Warner Communications
233 Bramerton Court
Franklin, Tennessee 37069
Tel. No. (615) 376-6404
Fax. No. (615) 376-6405
Represented by Pennington Law Firm
Carolyn.Marek@twtelecom.com

Mark Buechele
Jonathan Audu
Paul Turner
Supra Telecommunications
& Information Systems, Inc.
2620 S.W. 27th Avenue
Miami, FL 33133
Tel. No. (305) 531-5286
Fax. No. (305) 476-4282
buechele@stis.net
jonathan.audu@stis.com
pturner@stis.com

Donna Canzano McNulty, Esq.
MCI WorldCom
1203 Governors Square Boulevard
Suite 201
Tallahassee, FL 32301
Tel. No. (850) 219-1008
Fax. No. (850) 219-1018
donna.mcnulty@wcom.com

Michael A. Gross
VP Reg. Affairs & Reg. Counsel
Florida Cable Telecomm. Assoc.
246 East 6th Avenue, Suite 100
Tallahassee, FL 32303
Tel. No. (850) 681-1990
Fax. No. (850) 681-9676
mgross@fcta.com

TCG South Florida
c/o Rutledge Law Firm
Kenneth Hoffman
P.O. Box 551
Tallahassee, FL 32302-0551
Tel. No. (850) 681-6788
Fax. No. (850) 681-6515
ken@reuphlaw.com

Laura L. Gallagher
Laura L. Gallagher, P.A.
101 E. College Avenue
Suite 302
Tallahassee, FL 32301
Tel. No. (850) 224-2211
Fax. No. (850) 561-3611
Represents MediaOne
gallagherl@gtlaw.com

Susan S. Masterton
Charles J. Rehwinkel
Sprint Comm. Co. LLP
P.O. Box 2214
MC: FLTLHO0107
Tallahassee, FL 32316-2214
Tel. No. (850) 847-0244
Fax. No. (850) 878-0777
susan.masterton@mail.sprint.com

Sprint-Florida, Incorporated
Mr. F. B. (Ben) Poag
P.O. Box 2214 (MC FLTLHO0107)
Tallahassee, FL 32316-2214
Tel: 850-599-1027
Fax: 407-814-5700
Ben.Poag@mail.sprint.com

William H. Weber, Senior Counsel
Gene Watkins
Covad Communications
1230 Peachtree Street, N.E.
19th Floor
Atlanta, Georgia 30309
Tel. No. (404) 942-3494
Fax. No. (404) 942-3495
wweber@covad.com
gwatkins@covad.com

Bettye Willis
ALLTEL Comm. Svcs. Inc.
One Allied Drive
Little Rock, AR 72203-2177
bettye.j.willis@alltel.com

J. Jeffrey Wahlen
Ausley & McMullen
P.O. Box 391
Tallahassee, FL 32302
jwahlen@ausley.com

Rodney L. Joyce
Shook, Hardy & Bacon, L.L.P.
600 14th Street, N.W.
Suite 800
Washington, DC 20005-2004
Tel. No. (202) 639-5602
Fax. No. (202) 783-4211
Counsel for Network Access Solutions
rjoyce@shb.com

Brent McMahan, Vice President
Regulatory and Governmental Affairs
Network Telephone Corporation
815 South Palafox Street
Pensacola, FL 32501
Tel. No. (850) 432-4855
Fax. No. (850) 437-0724
Brent.McMahan@networktelephone.net

Network Access Solutions Corp.
Mr. Don Sussman
Three Dulles Tech Center
13650 Dulles Technology Drive
Herndon, VA 20171-4602
Tel. No.: (703) 793-5102
Fax. No. (208) 445-7278
dsussman@nas-corp.com

Ms. Nanette S. Edwards
4092 South Memorial Parkway
Huntsville, AL 35802-4343
Tel. No. (256) 382-3856
Fax. No. (256) 382-3936
nedwards@itcdeltacom.com

Ms. Lisa A. Riley
Michael Henry
Roger Fredrickson
1200 Peachtree Street, N.E.
Suite 8066
Atlanta, GA 30309-3523
Tel. No. (404) 810-7812
Fax. No. (404) 877-7646
lriley@att.com
michaeljhenry@att.com
rfredrickson@att.com

Florida Digital Network, Inc.
Matthew Feil, Esq.
390 North Orange Avenue
Suite 2000
Orlando, FL 32801
Tel. No. (407) 835-0460
Fax. No. (407) 835-0309
mfeil@floridadigital.net

FPTA, Inc.
Mr. David Tobin
Tobin & Reyes
7251 West Palmetto Park Road
#205
Boca Raton, FL 33433-3487
Tel. No. (561) 620-0656
Fax. No. (561) 620-0657
dst@tobinreyes.com

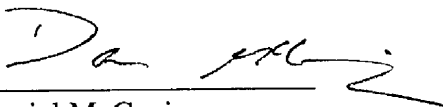
John McLaughlin
KMC Telecom. Inc.
Mr. John D. McLaughlin, Jr.
1755 North Brown Road
Lawrenceville, GA 30043
Tel. No. (678) 985-6261
Fax. No. (678) 985-6213
jmclau@kmctelecom.com

Joseph A. McGlothlin
Vicki Gordon Kaufman
Tim Perry
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman, Arnold,
& Steen, P.A.
117 South Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 222-2525
Fax. No. (850) 222-5606
Attys. for FCCA
Atty. for Network Telephone Corp.
Atty. for BlueStar
mcglathlin@mac-law.com
vkaufman@mac-law.com
tperry@mac-law.com

Andrew Isar
Telecomm. Resellers Assoc.
7901 Skansie Avenue
Suite 240
Gig Harbor, WA 98335
Tel. No. (253) 851-6700
Fax. No. (253) 851-6474
aisar@millerisar.com

Tracy W. Hatch, Esq.
Floyd R. Self, Esq.
Messer, Caparello & Self, P.A.
Post Office Box 1876
Tallahassee, FL 32302-1876
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Represents AT&T
Represents ITC^DeltaCom
fself@lawfla.com
thatch@lawfla.com

Richard D. Melson
Hopping Green Sams & Smith, P.A.
Post Office 6526
123 South Calhoun Street
Tallahassee, FL 32314
Tel. No. (850) 222-7500
Fax. No. (850) 224-8551
Atty. For MCI & ACI
rmelson@hgslaw.com


Daniel McCuaig

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of Competitive)
Carriers for Commission Action) Docket No. 981834-TP
To Support Local Competition)
In Verizon FL's Service Territory)

In re: Petition of ACI Corp. d/b/a)
Accelerated Connections, Inc. for) Docket No. 990321-TP
Generic Investigation into Terms and)
Conditions of Physical Collocation)
_____) Filed: April 11, 2003

**VERIZON FLORIDA INC.'S INITIAL OBJECTIONS TO
STAFF'S FIFTH SET OF INTERROGATORIES AND
FIFTH REQUEST FOR PRODUCTION OF DOCUMENTS**

Verizon Florida Inc. ("Verizon FL"), pursuant to Rule 28-106.206 of the Florida Administrative Code and Rules 1.340 and 1.280 of the Florida Rules of Civil Procedure, hereby files the following Initial Objections to Staff's Fifth Set of Interrogatories and Fifth Request for Production of Documents, both dated April 2, 2003.

The objections stated herein are preliminary in nature and are made at this time to comply with the requirement set forth in Order No. PSC-02-1513-PCO-TP, issued on November 4, 2002 by the Florida Public Service Commission ("Commission"). Should additional grounds for objection be discovered as Verizon FL prepares its answers to the above-referenced Interrogatories and Requests, Verizon FL reserves the right to supplement, revise, or modify its objections at the time it serves its responses.

GENERAL OBJECTIONS

1. Verizon FL objects to each Production Request and Interrogatory to the extent that it seeks to impose an obligation on Verizon FL to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such Interrogatory or Request is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. Verizon FL objects to each Production Request and Interrogatory to the extent that it is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission. Verizon FL objects to each such Interrogatory and Request as being irrelevant, overly broad, unduly burdensome, and oppressive.

3. Verizon FL objects to each Production Request and Interrogatory to the extent that it requests information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. Verizon FL objects to each Production Request and Interrogatory to the extent that it is vague, ambiguous, overly broad, imprecise, or to the extent that it utilizes terms that are subject to multiple interpretations and are not properly defined or explained for purposes of this discovery. Any answers provided by Verizon FL in response to these Interrogatories and Production Requests will be provided subject to, and without waiver of, the foregoing objection.

5. Verizon FL objects to each Production Request and Interrogatory to the extent that it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. Verizon FL will attempt to note in its responses each instance where this objection applies.

6. Verizon FL objects to providing information to the extent that such information is already in the public record before the Commission.

7. Verizon FL objects to each Production Request and Interrogatory to the extent that it seeks to impose obligations on Verizon FL that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

8. Verizon FL objects to each Production Request and Interrogatory to the extent that responding to it would be unduly burdensome, expensive, oppressive, or excessively time consuming.

9. Verizon FL objects to each Production Request and Interrogatory to the extent that it is not limited to any stated period of time and, therefore, is overly broad and unduly burdensome.

10. Verizon is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, Verizon 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. Verizon FL will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the Production Requests or Interrogatories purport to require more, Verizon FL objects on the grounds that compliance would impose an undue burden or expense.

INITIAL SPECIFIC OBJECTIONS: FIFTH POD

In addition to the foregoing general objections, Verizon FL raises the following initial specific objections to the following individual request in Staff's Fifth Request for Production of Documents:

61. On page 4 of witness Ellis's testimony, lines 16-19, the witness states that all supporting workpapers for Verizon's cost study identify the source(s) of data, how the data are used in the collocation cost study to develop cost elements, how the cost data are used to develop rate elements, and to which form(s) of collocation each element applies. It has come to staff's attention that not all workpapers were submitted with Verizon's initial filing; e.g., the work papers yielding the annual cost factors were not included. Please provide All supporting workpapers associated with Verizon FL's collocation cost study including a clear designation of user adjustable inputs. Verizon's response should include three single cost model CDs, each of which contains all workpapers, source files, formulae, and calculations. Each CD should also include an index of the files.

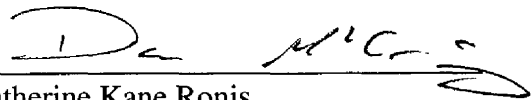
Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this document request on the grounds that it is overly broad and unduly burdensome. Verizon FL provided (146 pages of) direct support for its cost study as an attachment to Barbara Ellis's direct testimony. *See* Verizon FL Exhibit BKE-1, 90-235. In the course of discovery, Verizon FL has provided additional workpapers in response to specific requests contained in Staff's document requests 41 and 41(a). And Verizon FL will continue to produce specifically requested workpapers (unless the request is for some other reason

objectionable). A request for “All supporting workpapers” in any way “associated” with the EIS Cost Study, though, is unreasonably vague and overly broad.

In addition, it is unclear what Staff intends by a “single cost model CD.” Verizon FL does not have a single, integrated computer model incorporating all of the workpapers used to generate the EIS Cost Study. While Verizon FL has produced — and will continue to produce as specifically requested — workpapers in the format used by Verizon FL, it is under no obligation to create new files or programs for purposes of discovery.

Without waiving these objections, Verizon FL will provide the workpapers yielding its annual cost factors.

Respectfully submitted,



Catherine Kane Ronis
Daniel McCuaig
Wilmer, Cutler & Pickering
2445 M Street, NW
Washington, DC 20037-1420
(202) 663-6000

Dated: April 11, 2003

Attorneys for Verizon Florida Inc.