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May 8, 2003

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

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

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of Verizon Florida Inc.'s Initial Objections to Staff's Sixth Set of Interrogatories and Sixth 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

AUS ____
CAF ____
CMP ____
COM ____
CTR ____
ECR ____
GCL ____
OPC ____
MMS ____
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OTH ____

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 8th day of May, 2003 (with service via First Class U.S. Mail or Facsimile to follow) to the following:

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jebrown@psc.state.fl.us
lking@psc.state.fl.us; bcasey@psc,state.fl.us
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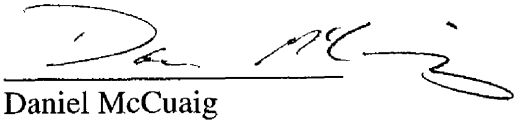


Daniel McCuaig

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for Commission Action To Support Local Competition In Verizon FL's Service Territory	)	Docket No. 981834-TP
In re: Petition of ACI Corp. d/b/a Accelerated Connections, Inc. for Generic Investigation into Terms and Conditions of Physical Collocation	)	Docket No. 990321-TP
	)	Filed: May 8, 2003

VERIZON FLORIDA INC.'S INITIAL OBJECTIONS TO STAFF'S SIXTH SET OF INTERROGATORIES AND SIXTH 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 Sixth Set of Interrogatories and Sixth Request for Production of Documents, both served on Verizon FL via e-mail on April 29, 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: SIXTH INTERROGATORIES

In addition to the foregoing general objections, Verizon FL raises the following initial specific objections to the following individual Interrogatories in Staff's Sixth Set of Interrogatories:

100. In the network modeled in Verizon FL's cost study, what portion of the modeled underground metallic cable represents feeder? What portion represents distribution?

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Interrogatory on the grounds that the distribution of Verizon FL's outside plant is irrelevant to this collocation cost proceeding.

105. Provide the percent of Verizon FL interoffice capacity provisioned on SONET at the end of 2002.

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Interrogatory on the grounds that its interoffice use of SONET is irrelevant to this collocation cost proceeding.

106. Provide the percent of Verizon FL loop fiber capacity provisioned on SONET at the end of 2002.

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Interrogatory on the grounds that its use of SONET to provision fiber loops is irrelevant to this collocation cost proceeding.

107. Does the TELRIC network construct in Verizon FL's collocation cost study assume all switching is provided by packet switching? Explain your answer.

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Interrogatory on the grounds that Verizon FL's use of packet switching, if any, is irrelevant to this collocation cost proceeding.

110. What percent of a digital switch investment is associated with the processor?

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Interrogatory on the grounds that the percentage of Verizon FL's digital switch investment that is associated with the processor is irrelevant to this collocation cost proceeding.

111. What percent of a digital switch investment is associated with line cards?

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Interrogatory on the grounds that the percentage of Verizon FL's digital switch investment that is associated with line cards is irrelevant to this collocation cost proceeding.

112. Explain under what conditions Verizon replaces feeder or distribution transmission facilities.

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Interrogatory on the grounds that its replacement of outside plant is irrelevant to this collocation cost proceeding.

116. Under what engineering guidelines or other circumstances is ATM switching placed in Verizon FL's TELRIC modeled network?

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Interrogatory on the grounds that its placement of ATM switching is irrelevant to this collocation cost proceeding.

117. Under what engineering guidelines or other circumstances is ATM switching currently being placed in Verizon FL's network?

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Interrogatory on the grounds that its placement of ATM switching is irrelevant to this collocation cost proceeding.

118. Provide Verizon's view of the next-generation switching architecture and discuss how it will impact existing switches and carrier equipment.

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Interrogatory on the grounds that its forecasts of future switching architecture, to the extent it has any, are both proprietary and irrelevant to this collocation cost proceeding.

119. a. Describe Verizon's idea of the basic architecture of a full-service network that will deliver both narrowband and broadband services.

b. Is this architecture being deployed by Verizon FL?

c. Is the network modeled by Verizon in its collocation cost study in line with this idea? If no, why not?

d. Identify the specific technologies specified in the full-service network architecture.

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Interrogatory on the grounds that its understanding of the full-service network architecture, to the extent it has any, is both highly proprietary and irrelevant to this collocation cost proceeding.

120. For each state, other than Florida, where a regulatory commission has not adopted Verizon's financial reporting depreciation lives for any purpose since January 1,

1997, provide the state regulatory commission, commission order number, the date the order was issued, and a description of the lives adopted.

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Interrogatory on the grounds that it is unduly burdensome and overly broad. Verizon FL does not maintain the records required to respond to this Interrogatory, and the sources that do contain such information (i.e., regulatory commission orders) are publicly available. In addition, Verizon FL already has described the outcomes of recent UNE dockets addressing depreciation in its Response to Staff Interrogatory 76.

121. When does Verizon FL forecast it will no longer add copper feeder cables?

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Interrogatory on the grounds that its use of outside plant is irrelevant to this collocation cost proceeding.

122. What is the current replacement facility for a retiring copper feeder and distribution transmission facility?

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Interrogatory on the grounds that its use of outside plant is irrelevant to this collocation cost proceeding.

123. Discuss Verizon FL's plans regarding the deployment of ATM switching.

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Interrogatory on the grounds that its business plans regarding the deployment of ATM switching, to the extent it has any, are both highly proprietary and irrelevant to this collocation cost proceeding.

124. Explain Verizon FL's deployment strategy for fiber cable in the feeder and distribution portions of the network.

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Interrogatory on the grounds that its deployment strategy for outside plant, to the extent it has any, is both highly proprietary and irrelevant to this collocation cost proceeding.

127. For each of the years 1996-2002, provide Verizon FL's investment in copper and fiber cables separated between interoffice, feeder, and distribution.

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Interrogatory on the grounds that it is unduly burdensome and overly broad, and that its investment in outside plant is irrelevant to this collocation cost proceeding.

128. For each of the years 1991-2002, provide the following information for Verizon FL: sheath kilometers – copper, sheath kilometers – fiber, total cable investment, copper investment, and fiber investment.

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Interrogatory on the grounds that it is unduly burdensome and overly broad, and that Verizon FL's investment in outside plant is irrelevant to this collocation cost proceeding.

130. When does Verizon FL forecast it will no longer add copper cables in the distribution portion of the network?

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Interrogatory on the grounds that its outside plant forecasts, to the extent it has any, are irrelevant to this collocation cost proceeding.

144. When did Verizon FL begin deployment of DSL technology?

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Interrogatory on the grounds that its deployment of DSL technology is irrelevant to this collocation cost proceeding.

145. When did DSL technology first emerge in the industry?

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Interrogatory on the grounds that it is vague and irrelevant.

147. Where copper cables are in-place, has Verizon developed a business case where the replacement of existing copper with fiber is economical? If so, explain.

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Interrogatory on the grounds that its outside plant business cases, to the extent it has any, are both highly proprietary and irrelevant to this collocation cost proceeding.

148. What are Verizon FL plans for the deployment of ADSL2 and ADSL2+?

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Interrogatory on the grounds that its plans for deployment of digital subscriber line technologies, to the extent it has any, are both highly proprietary and irrelevant to this collocation cost proceeding.

149. Will ADSL2 and ADSL2+ provide increased bandwidths and additional services? Explain your answer.

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Interrogatory on the grounds that its forecasts of digital subscriber line

technologies, to the extent it has any, are both highly proprietary and irrelevant to this collocation cost proceeding.

154. What is the replacement technology for digital switching?

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Interrogatory on the grounds that its forecasts of digital switching technologies, to the extent it has any, are both highly proprietary and irrelevant to this collocation cost proceeding.

155. What is the replacement technology for digital circuit?

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Interrogatory on the grounds that its forecasts of circuit technologies, to the extent it has any, are both highly proprietary and irrelevant to this collocation cost proceeding.

INITIAL SPECIFIC OBJECTIONS: SIXTH POD

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

63. Except for the referenced TFI study and the NARUC *Public Utilities Depreciation Practices*, please provide copies of all materials and documents witness Sovereign relied on or referenced in his testimony.

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Request on the grounds that it is ambiguous, overly broad, and unduly burdensome. Notwithstanding and without waiving these objections, Verizon FL will produce copies of all materials Mr. Sovereign cites or substantially relies upon in his testimony.

64. Please provide a copy of Verizon FL's deployment strategies or guidelines regarding feeder and distribution fiber cable.

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Request on the grounds that its strategies and guidelines regarding outside plant, to the extent it has any, are irrelevant to this collocation cost proceeding.

65. Please provide a copy of Verizon FL's deployment guidelines for digital and analog circuit equipment.

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Request on the grounds that its deployment guidelines for digital and analog circuit equipment, to the extent it has any, are irrelevant to this collocation cost proceeding.

66. Please provide a copy of Verizon FL's deployment guidelines for the installation of new circuit based switches.

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Request on the grounds that its guidelines for the installation of new circuit based switches, to the extent it has any, are irrelevant to this collocation cost proceeding.

67. Please provide a copy of Verizon FL's deployment guidelines for packet switching.

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Request on the grounds that its deployment guidelines for packet switching, to the extent it has any, are irrelevant to this collocation cost proceeding.

69. Please provide a copy of Verizon FL's deployment guidelines for DSL technologies.

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Request on the grounds that its deployment guidelines DSL technologies, to the extent it has any, are irrelevant to this collocation cost proceeding.

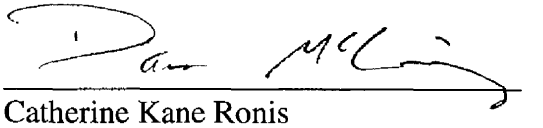
70. Please provide each document in your possession, custody or control, evaluating, analyzing or commenting on Verizon's forecasts of demand for broadband services.

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Request on the grounds that its forecasts of demand for broadband services, to the extent it has any, are both highly proprietary and irrelevant to this collocation cost proceeding.

71. For Verizon FL and Verizon Corporation, please provide complete copies of all reports, reviews, e-mails, and analyses since January 1, 1999, where the subject has been depreciation lives, salvage values, depreciation rates, or capital recovery.

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Request on the grounds that it is overly broad and unduly burdensome. Notwithstanding and without waiving these objections, Verizon FL will produce copies of such materials as can be assembled without undue burden.

Respectfully submitted,



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Dated: May 8, 2003

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