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May 27, 2003

VIA HAND DELIVERY

Blanca S. Bayo, Director
Division of Records and Reporting
Betty Easley Conference Center
4075 Esplanade Way
Tallahassee, Florida 32399-0870

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COMMISSION CLERK

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

Dear Ms. Bayo:

On behalf of DIECA Communications, Inc. d/b/a Covad Communications Company (Covad), enclosed for filing and distribution are the original and 15 copies of the following:

- ▶ DIECA Communications, Inc. d/b/a Covad Communications Company's Preliminary Objections to Verizon Florida, Inc.'s First Set of Interrogatories (Nos. 1-17).

Please acknowledge receipt of the above on the extra copy of each and return the stamped copies to me. Thank you for your assistance.

Sincerely,

Vicki Gordon Kaufman

AUS _____
 CAF _____
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MCWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN & ARNOLD, P.A.

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FPSC-COMMISSION CLERK

modify its objections at the time that it serves its Responses on Verizon. Moreover, should Covad determine that a Protective Order is necessary with respect to any of the material requested by Verizon, Covad reserves the right to file a motion with the Commission seeking such an order at the time that it serves its Responses on Verizon.

General Objections

Covad makes the following General Objections to Verizon's First Set of Interrogatories which will be incorporated by reference into Covad's Responses when its Responses are served on Verizon.

1. Covad objects to Verizon's First Set of Interrogatories to the extent that it is overly broad, unduly burdensome, oppressive, not permitted by applicable discovery rules, and would require Covad to disclose information that is privileged.

2. Covad has interpreted Verizon's requests to apply to Covad'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, Covad objects to such request as irrelevant, overly broad, unduly burdensome, and oppressive.

3. Covad objects to each and every request and instruction to the extent that such request or instruction calls for information, which is exempt from discovery by virtue of the attorney-client privilege, work product privilege or other applicable privilege.

4. Covad 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 Covad in response to Verizon's requests will be provided subject to, and without waiver of, the foregoing objection.

5. Covad 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. Covad will attempt to note each instance where this objection applies.

6. Covad objects to Verizon's general instructions, definitions or specific discovery requests insofar as they seek to impose obligations on Covad which exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

7. Covad objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

8. Covad's objects to each and every request, general instruction, or definition insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. Covad 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 Verizon's requests seek proprietary confidential business information which is not the subject of the "trade secrets" privilege, Covad will

make such information available to counsel for Verizon pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

10. Covad is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, Covad creates countless documents that are not subject to Florida Public Service Commission or FCC retention of records requirements. These documents are kept in numerous locations and are frequently moved from site to site as employees change jobs or as the business is reorganized. These responses will provide all of the information obtained by Covad after a reasonable and diligent search conducted in connection with this discovery request. Covad will comply with Verizon's request that a search be conducted of those files that are reasonably expected to contain the requested information. To the extent that the discovery request purports to require more, Covad objects on the grounds that compliance would impose an undue burden or expense.

11. Covad objects to the definitions of "Covad", "You" and "Company" to the extent that such definitions seek to impose an obligation on Covad to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such definition is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. Without waiver of its general objection, and subject to other general and specific objections, Answers will be provided on behalf of Covad, which is

the entity certificated to provide regulated telecommunications services in Florida and which is a party to this docket.

12. Covad further objects to these interrogatories on the grounds that the information sought is not relevant nor reasonably calculated to lead to the discovery of admissible evidence. Information related to Covad collocation arrangements or other telecommunications facilities is not in any way probative of the appropriate costs to be used in establishing the appropriate TELRIC price to be charged by Verizon-Florida for unbundled network elements including collocation. Covad, as a competitive CLEC attempting to enter the local telecommunications service market, bears no resemblance to the least cost forward looking company serving all customers in the Verizon-Florida territory on a wholesale only basis.

Specific Objections

In addition to the foregoing general objections, Covad makes the following Specific Objections to Verizon's First Set of Interrogatories which will be incorporated by reference into Covad's responses when its Responses are served on Verizon:

Interrogatory 1 (g) and (h); 2(h) through 2(k):

Covad objects to Verizon's request for Covad's monthly recurring and non-recurring costs associated with ILEC collocation on the grounds that the information sought is in the public record before this Commission. Covad further objects to Verizon's request for Covad's non-ILEC collocation costs on the grounds that the information sought is proprietary and not relevant nor reasonably calculated to lead to the

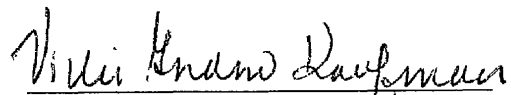
discovery of admissible evidence. Covad further objects to these interrogatories on the grounds that information related to Covad collocation arrangements or other telecommunications facilities is not in any way probative of the appropriate costs to be used in establishing the appropriate TELRIC price to be charged by Verizon-Florida for unbundled network elements including collocation. Covad, as a competitive CLEC attempting to enter the local telecommunications service market, bears no resemblance to the least cost forward looking company serving all customers in the Verizon-Florida territory on a wholesale only basis.

Interrogatory 11 (a) through (f):

Covad objects to Verizon's request for Covad's collocation cable racking costs on the grounds that the information sought is proprietary and not relevant nor reasonably calculated to lead to the discovery of admissible evidence. Information related to Covad collocation arrangements or other telecommunications facilities is not in any way probative of the appropriate costs to be used in establishing the appropriate TELRIC price to be charged by Verizon-Florida for unbundled network elements including collocation. Covad, as a competitive CLEC attempting to enter the local telecommunications service market, bears no resemblance to the least cost forward looking company serving all customers in the Verizon-Florida territory on a wholesale only basis.

Interrogatories 12 through 17:

Covad objects to this interrogatory on the grounds that the information sought is not relevant nor reasonably calculated to lead to the discovery of admissible evidence. The depreciation rates, lives and cost of capital for any CLEC are not in any way probative of the appropriate cost of capital to be used in establishing the appropriate TELRIC price to be charged by Verizon-Florida for unbundled network elements, including collocation. Covad as a competitive CLEC attempting to enter the local telecommunications service market, bears no resemblance to the least cost forward looking company serving all customers in the Verizon-Florida territory on a wholesale only basis.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing DIECA Communications Inc. d/b/a Covad Communications Company's Preliminary Objections to Verizon Florida, Inc.'s First Set of Interrogatories (Nos. 1 - 17) has been furnished by (*) hand delivery, (**) electronic mail and U.S. Mail this 27th day of May, 2003, to the following:

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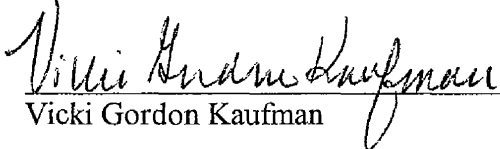
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