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August 18, 2003

Ms. Blanca Bayó, Director  
Division of the Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

RECEIVED-FPSC  
AUG 18 PM 4:51  
COMMISSION  
CLERK

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

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint are:

1. The original and one copy of Sprint's Notice of Service of Responses to Staff's Eighth Set of Interrogatories (Nos. 77 – 83) and Staff's Ninth Requests for Production of Documents (Nos. 60 – 63). *07618-03*
2. The original and fifteen copies of Sprint's Notice of Intent to Request Confidential Classification. *07619-03*
3. Sprint-Florida, Incorporated's Motion to Accept Late-Filed Discovery Responses *07620-03*

Service was made on August 15, 2003 via electronic mail and on August 18, 2003 via U.S. Mail to the parties listed on the attached service list.

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

Enclosures  
RECEIVED & FILED

*R-v-n.*

FPSC-BUREAU OF RECORDS

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: August 18, 2003

**SPRINT -FLORIDA, INCORPORATED'S MOTION TO ACCEPT LATE-FILED DISCOVERY RESPONSES**

Sprint-Florida, Incorporated ("Sprint"), pursuant to Rule 28-106.204, Florida Administrative Code, hereby files this motion to accept its late-filed responses to staff's Eighth Set of Interrogatories and Ninth Request for Production of Documents, to be entered into the record of the August 11 and 12, 2003 hearing, as part of late-filed Exhibit No. In support thereof, Sprint states as follows:

1. Staff served its Eighth Set of Interrogatories and Ninth Request for Production of Documents electronically to Sprint on July 23, 2003. Based on the 20-day time frame for responding set forth in the Order on Procedure, Order No. PSC-02-1513-PCO-TP, Sprint's responses were due on August 12, 2003.

2. At the hearing in this matter held on August 11 and 12, 2003, staff sponsored these responses as a late-filed exhibit (Late-filed Exhibit No. 5) to be entered into the record of the

proceeding. At the hearing Chairman Jaber requested that the parties file the responses no later than Friday, August 15, 2003.

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*Marquette*

DOCUMENT NUMBER - DATE

07620 AUG 18 8

FPSC-COMMISSION CLERK

3. At the hearing Sprint indicated that it could meet the Friday, August 15, 2003 deadline, and at that time fully intended to and had no reason to believe that it would not be able to meet the Commission's due date.

4. As a result of the discussion at the hearing and the extended time frame to file responses, Sprint engaged in additional review of its responses to the discovery, particularly its response regarding the costs associated with the metering of power usage. Sprint's intent was to ensure that the responses would provide as complete and accurate information as possible for the record in this proceeding within the time frame allotted.

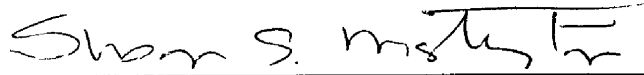
5. On Tuesday, August 12, 2003 Sprint's computer network was infected by a computer virus. These technology difficulties contributed to Sprint's failure to timely prepare and transmit the discovery responses.

6. As a result of the above, Sprint was unable to fulfill its commitment to meet the deadline for serving and filing the discovery responses by the close of business on Friday, August 15, 2003. However, Sprint served redacted copies of the discovery responses to the parties electronically at around 8:00 p.m. on Friday, August 15, 2003, and is submitting and serving hard copies of the redacted responses, as well as filing the confidential portions of the discovery, simultaneously with this motion on Monday, August 18, 2003.

7. No party will be prejudiced by Sprint's filing the discovery responses today. Sprint has contacted counsel for the parties to this docket either personally or through voice mail. Based on these contacts, to the best of Sprint's knowledge, no party objects to this Motion.

WHEREFORE, Sprint requests that the Commission accept Sprint's late-filed responses to the Staff's Eighth Set of Interrogatories and Ninth Request for Production of Documents.

Respectfully submitted this 18<sup>th</sup> day of August, 2003.

A handwritten signature in cursive script that reads "Susan S. Masterton". The signature is written in black ink and is positioned above a horizontal line.

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**ATTORNEY FOR SPRINT**

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

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by hand delivery (\*), electronic mail & U.S. mail this 18th day of August, 2003 to the following:

Adam Teitzman, Staff Counsel (\*)  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0870

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ITC^DeltaCom Communications, Inc.  
Nanette Edwards  
Messer, Caparello & Self  
Post Office Box 1876  
Tallahassee, Florida 32302-1876

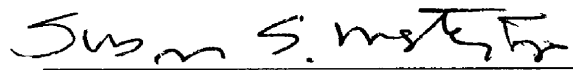
**(P) Proprietary Version**

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KMC Telecom, Inc.  
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Susan S. Masterton