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September 25, 2003

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COMMISSION
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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 Covad's Second Set of Interrogatories and Second 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.

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TH
FPSC-BUREAU OF RECORDS

Sincerely,

Daniel McCuaig

Daniel McCuaig

cc: All Parties of Record
Charles Schubart

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FPSC-COMMISSION CLERK

**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

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: Sept. 25, 2003

**VERIZON FLORIDA INC.'S INITIAL OBJECTIONS TO
DIECA COMMUNICATIONS, INC. D/B/A COVAD COMMUNICATIONS COMPANY'S
SECOND SET OF INTERROGATORIES (NOS. 6-31) AND
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 2)**

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 DIECA Communications, Inc. d/b/a Covad Communications Company's (Covad's) Second Set of Interrogatories and Second Request for Production of Documents, both served on Verizon FL via e-mail on September 15, 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

In addition to the foregoing general objections, Verizon FL raises the following initial specific objections to the following individual Interrogatories in Covad's Second Set of Interrogatories and Second Set of Production Requests:

INTERROGATORY NO. 6. For each new power plant constructed in Verizon's central offices in Florida since January 1, 1996, provide:

- a. the central office CLLI code;
- b. The date of the new construction;
- c. The total cost of the power plant;
- d. The total capacity of the power plant after completion of the construction;
- e. The total capacity of the power plant before the new construction; if any;
- f. The number of collocated CLECs at the central office immediately before the new construction;
- g. The total requested available DC power in amperes by all collocated CLECs at the central office immediately before the new construction;
- h. The total available power requirements of Verizon at the central office immediately before the new construction;
- i. Whether available power requested by collocated CLECs were causative of the need for the new construction.

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, overly broad, and irrelevant. Verizon FL also objects to this Interrogatory on the grounds that it seeks information related, if at all, solely to the technical phase of

this proceeding, which is now concluded. If this information were discoverable, Covad could have sought this information through discovery in advance of the technical hearing, and it could have — and did — cross-examine Verizon FL's witness at that hearing. The technical record is now closed.

INTERROGATORY NO. 7. For each augment to batteries, rectifiers or generators made to power plants in Verizon's central office in Florida since January 1, 1996, provide:

- a. the central office CLLI code;
- b. The date of the augment to batteries, rectifiers or generators;
- c. The total cost of the augment to batteries, rectifiers or generators;
- d. The total capacity of the power plant after completion of the augment to batteries, rectifiers or generators;
- e. The total capacity of the power plant before augment to batteries, rectifiers or generators;
- f. The number of collocated CLECs at the central office immediately before the augment to batteries, rectifiers or generators;
- g. The total requested available DC power in amperes by all collocated CLECs at the central office immediately before the augment to batteries, rectifiers or generators;
- h. The total available power requirements of Verizon at the central office immediately before the augment to batteries, rectifiers or generators;
- i. Whether available power requested by collocated CLECs were causative of the need for the augment to batteries, rectifiers or generators.

If more than one augment has been done to a particular central office since January 1, 1996, provide the above information separately for each augment done.

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, overly broad, and irrelevant. Verizon FL also objects to this Interrogatory on the grounds that it seeks information related, if at all, solely to the technical phase of this proceeding, which is now concluded. If this information were discoverable, Covad could have sought this information through discovery in advance of the technical

hearing, and it could have — and did — cross-examine Verizon FL's witness at that hearing. The technical record is now closed.

INTERROGATORY NO. 9. For all power plants constructed or augmented prior to January 1, 1996, were the costs of said power plants or augments to power plants paid for by adjustments to the rates for local service in Florida? If not please explain.

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, overly broad, and irrelevant. Verizon FL also objects to this Interrogatory on the grounds that it seeks information related, if at all, solely to the technical phase of this proceeding, which is now concluded. If this information were discoverable, Covad could have sought this information through discovery in advance of the technical hearing, and it could have — and did — cross-examine Verizon FL's witness at that hearing. The technical record is now closed.

INTERROGATORY NO. 12. For each central office with current physically collocated CLEC9s), please provide:

- a. The CLLI code identifying the central office
- b. The current number of collocated CLECs in the central office
- c. The total amperes ordered by each CLEC (if the CLEC uses its own BDFB, please only indicate the actual ordered amperes, not the fused amperes)
- d. Identify the date each said CLEC physically collocated in the central office.

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, overly broad, and irrelevant. Verizon FL also objects to this Interrogatory on the grounds that it seeks information related, if at all, solely to the technical phase of this proceeding, which is now concluded. If this information were discoverable, Covad

could have sought this information through discovery in advance of the technical hearing, and it could have — and did — cross-examine Verizon FL's witness at that hearing. The technical record is now closed.

INTERROGATORY NO. 13. If the Commission requires Verizon to offer a non-recurring charge (NRC) to recover its infrastructure cost on a per ampere basis, how much should such a charge be?

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 wholly speculative, as there is no basis to assume that the Commission is considering requiring Verizon FL to recover its costs through such a non-recurring charge. In addition, Verizon FL is under no obligation to undertake special studies for purposes of discovery.

INTERROGATORY NO. 14. If maintenance costs are included in the NRC provided in Interrogatory No. 13 above, what portion of the charge is attributable to maintenance?

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 wholly speculative, as there is no basis to assume that the Commission is considering requiring Verizon FL to recover its costs through a non-recurring charge of the type described in Interrogatory No. 13. In addition, Verizon FL is under no obligation to undertake special studies for purposes of discovery.

INTERROGATORY NO. 15. If maintenance costs are not included in the NRC provided in Interrogatory No. 13 above, what additional charges would apply if the Commission required the NRC to reflect maintenance?

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 wholly speculative, as there is no basis to assume that the Commission is considering requiring Verizon FL to recover its costs through a non-recurring charge of the type described in Interrogatory No. 13. In addition, Verizon FL is under no obligation to undertake special studies for purposes of discovery.

INTERROGATORY NO. 16. Provide all calculations supporting the charges listed in Interrogatory Nos. 13 - 15 above.

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 wholly speculative, as there is no basis to assume that the Commission is considering requiring Verizon FL to recover its costs through a non-recurring charge of the type described in Interrogatory No. 13. In addition, Verizon FL is under no obligation to undertake special studies for purposes of discovery.

INTERROGATORY NO. 20. Provide the total capacity in amperes on an aggregate basis for all Verizon central offices in Florida today.

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, overly broad, and irrelevant. Verizon FL also objects to this Interrogatory on the grounds that it seeks information related, if at all, solely to the technical phase of this proceeding, which is now concluded. If this information were discoverable, Covad could have sought this information through discovery in advance of the technical

hearing, and it could have — and did — cross-examine Verizon FL's witness at that hearing. The technical record is now closed.

INTERROGATORY NO. 21. Of the total capacity in amperes provided in response to Interrogatory No. 20, what percentage of that capacity is currently ordered available capacity by CLECs who are collocated with Verizon?

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, overly broad, and irrelevant. Verizon FL also objects to this Interrogatory on the grounds that it seeks information related, if at all, solely to the technical phase of this proceeding, which is now concluded. If this information were discoverable, Covad could have sought this information through discovery in advance of the technical hearing, and it could have — and did — cross-examine Verizon FL's witness at that hearing. The technical record is now closed.

INTERROGATORY NO. 22. Of the total capacity in amperes identified in response to Interrogatory No. 20, how much of that total capacity in amperes is currently unused or spare capacity?

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, overly broad, and irrelevant. Verizon FL also objects to this Interrogatory on the grounds that it seeks information related, if at all, solely to the technical phase of this proceeding, which is now concluded. If this information were discoverable, Covad could have sought this information through discovery in advance of the technical

hearing, and it could have — and did — cross-examine Verizon FL's witness at that hearing. The technical record is now closed.

INTERROGATORY NO. 23. Provide the total capacity in amperes that has been added as augments or new construction on an aggregate basis for all Verizon central offices in Florida since January 1, 1996.

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, overly broad, and irrelevant. Verizon FL also objects to this Interrogatory on the grounds that it seeks information related, if at all, solely to the technical phase of this proceeding, which is now concluded. If this information were discoverable, Covad could have sought this information through discovery in advance of the technical hearing, and it could have — and did — cross-examine Verizon FL's witness at that hearing. The technical record is now closed.

INTERROGATORY NO. 24. Of the total capacity in amperes provided in response to Interrogatory No. 23, what percentage of that capacity is currently ordered available capacity by CLECs who are collocated with Verizon?

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, overly broad, and irrelevant. Verizon FL also objects to this Interrogatory on the grounds that it seeks information related, if at all, solely to the technical phase of this proceeding, which is now concluded. If this information were discoverable, Covad could have sought this information through discovery in advance of the technical

hearing, and it could have — and did — cross-examine Verizon FL's witness at that hearing. The technical record is now closed.

INTERROGATORY NO. 25. Of the total capacity in amperes identified in response to Interrogatory No. 23, how much of that total capacity in amperes is currently unused or spare capacity?

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, overly broad, and irrelevant. Verizon FL also objects to this Interrogatory on the grounds that it seeks information related, if at all, solely to the technical phase of this proceeding, which is now concluded. If this information were discoverable, Covad could have sought this information through discovery in advance of the technical hearing, and it could have — and did — cross-examine Verizon FL's witness at that hearing. The technical record is now closed.

INTERROGATORY NO. 26. For each Verizon central office in Florida, provide the current power capacity in amperes.

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, overly broad, and irrelevant. Verizon FL also objects to this Interrogatory on the grounds that it seeks information related, if at all, solely to the technical phase of this proceeding, which is now concluded. If this information were discoverable, Covad could have sought this information through discovery in advance of the technical hearing, and it could have — and did — cross-examine Verizon FL's witness at that hearing. The technical record is now closed.

INTERROGATORY NO. 27. For each Verizon central office in Florida, of the capacity in amperes per central office provided in response to Interrogatory No. 26, what percentage of that capacity has been ordered by CLECs who are collocated with Verizon?

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, overly broad, and irrelevant. Verizon FL also objects to this Interrogatory on the grounds that it seeks information related, if at all, solely to the technical phase of this proceeding, which is now concluded. If this information were discoverable, Covad could have sought this information through discovery in advance of the technical hearing, and it could have — and did — cross-examine Verizon FL's witness at that hearing. The technical record is now closed.

INTERROGATORY NO. 28. For each Verizon central office in Florida, of the total capacity in amperes identified in response to Interrogatory No. 26, how much of that total capacity in amperes is currently unused or spare capacity?

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, overly broad, and irrelevant. Verizon FL also objects to this Interrogatory on the grounds that it seeks information related, if at all, solely to the technical phase of this proceeding, which is now concluded. If this information were discoverable, Covad could have sought this information through discovery in advance of the technical hearing, and it could have — and did — cross-examine Verizon FL's witness at that hearing. The technical record is now closed.

INTERROGATORY NO. 29. For each Verizon central office in Florida, provide the total capacity in amperes that has been added as augments or new construction in Florida since January 1, 1996.

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, overly broad, and irrelevant. Verizon FL also objects to this Interrogatory on the grounds that it seeks information related, if at all, solely to the technical phase of this proceeding, which is now concluded. If this information were discoverable, Covad could have sought this information through discovery in advance of the technical hearing, and it could have — and did — cross-examine Verizon FL's witness at that hearing. The technical record is now closed.

INTERROGATORY NO. 30. For each Verizon central office in Florida, of the capacity in amperes per central office provided in response to Interrogatory No. 29, what percentage of that capacity has been ordered by CLECs who are collocated with Verizon?

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, overly broad, and irrelevant. Verizon FL also objects to this Interrogatory on the grounds that it seeks information related, if at all, solely to the technical phase of this proceeding, which is now concluded. If this information were discoverable, Covad could have sought this information through discovery in advance of the technical hearing, and it could have — and did — cross-examine Verizon FL's witness at that hearing. The technical record is now closed.

INTERROGATORY NO. 31. For each Verizon central office in Florida, of the total capacity in amperes identified in response to Interrogatory No. 29, how much of that total capacity in amperes is currently unused or spare capacity?


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, overly broad, and irrelevant. Verizon FL also objects to this Interrogatory on the grounds that it seeks information related, if at all, solely to the technical phase of this proceeding, which is now concluded. If this information were discoverable, Covad could have sought this information through discovery in advance of the technical hearing, and it could have — and did — cross-examine Verizon FL's witness at that hearing. The technical record is now closed.

DOCUMENT REQUEST NO. 2. Produce all documents, workpapers and backup materials supporting the changes reflected in Interrogatory Nos. 13-16.

Objection: See Objections to Interrogatory Nos. 13-16.

Respectfully submitted,

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Dated: September 25, 2003

Attorneys for Verizon Florida Inc.

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 25th day of September, 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
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
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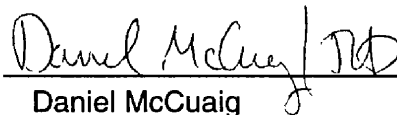
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