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October 20, 2003

Mrs. Blanca Bayo, Director
Division of Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

**RE: Docket No. 030851-TP -
SUPRA'S OBJECTIONS TO BELLSOUTH'S FIRST SETS OF
INTERROGATORIES AND REQUEST FOR PRODUCTION OF
DOCUMENTS**

Dear Mrs. Bayo:

Supra Telecommunications and Information Systems, Inc.'s (Supra) Notice of Service of its objections to Bellsouth's First Sets Of Interrogatories And Request For Production Of Documents to be filed in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return it to me.

Sincerely,

RECEIVED & FILED
Th
FPSC-BUREAU OF RECORDS

Jorge Cruz-Bustillo
Jorge Cruz-Bustillo
Assistant General Counsel

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CERTIFICATE OF SERVICE

Docket No. 030851-TP

I HEREBY CERTIFY that a true and correct copy of the following was served via Hand Delivery, Facsimile, U.S. Mail, and/or Federal Express this 30th day of September 2003 to the following:

*AT&T
Tracy Hatch
101 North Monroe Street, Suite 700
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*Allegiance Telecom of Florida, Inc.
Jeffrey J. Binder
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*Allegiance Telecom, Inc.
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Lombard, IL 60148
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*BellSouth Telecommunications, Inc.
R.Lackey/M.Mays/N.White/J.Meza/A.Shore
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*Florida Cable Telecommunications Assoc., Inc.
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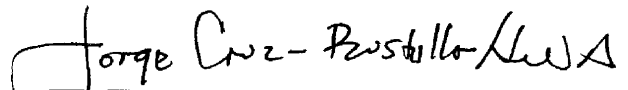
**SUPRA TELECOMMUNICATIONS
& INFORMATION SYSTEMS, INC.**

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Telephone: 305/ 476-4252

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By: Jorge Cruz-Bustillo

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements
Arising from Federal Communications
Commission Triennial UNE review: Local
Circuit Switching For Mass Market Customers

Docket No. 030851-TP

Filed: October 20, 2003

**SUPRA TELECOMMUNICATIONS AND INFORMATION SYSTEMS, INC.'S
OBJECTIONS TO BELL SOUTH'S FIRST SETS OF INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS (1-21)**

Pursuant to the *Order Establishing Procedure*, Order No. PSC-03-1054-PCO-TP, issued September 22, 2003 ("*Procedural Order*"), Rule 28-106.206 of the Florida Administrative Code, and Rules 1.280 and 1.340 of the Florida Rules of Civil Procedure, Supra hereby files its preliminary objections to BellSouth Telecommunications, Inc.'s ("BellSouth") First Sets of Interrogatories and Requests for Production of Documents that were propounded by BellSouth on October 13, 2003.

Supra files these objections to comply with the seven (7) day requirement set forth in the *Procedural Order*. These objections are preliminary in nature. Should additional grounds for objection be discovered as Supra prepares its responses to any discovery, Supra reserves the right to supplement these objections.

Further, at the time of the filing of these Objections, the issues to be addressed in this proceeding have not yet been identified. Should additional grounds for objections develop as the Commission identifies the issues to be addressed in this proceeding, Supra reserves the right to supplement these objections.

GENERAL OBJECTIONS

Supra makes the following general objections to the discoveries which will be incorporated by reference into Supra's specific responses when Supra responds to the discoveries.

1. Supra objects to the "Definitions" section, the "General Instructions," and the individual discovery items of BellSouth's First Sets of Interrogatories and Request for Production of Documents to Supra to the extent that they are overly broad, unduly burdensome, and/or oppressive.
2. Supra objects to the "Definitions," the "General Instructions," and the individual discovery items to the extent they are irrelevant and not likely to lead to the discovery of admissible evidence.
3. Supra objects to the discoveries to the extent they seek to discover information that is inconsistent with or unrelated to the parameters and methodology of the impairment analysis prescribed in the Triennial Review Order.
4. Supra objects to the "Definitions," the "General Instructions," and the discovery items to the extent they are vague, ambiguous, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these discoveries.
5. Supra objects to the "General Instructions" and the discovery items of BellSouth's First Sets of Interrogatories and Request for Production of Documents to Supra to the extent that they purport to impose discovery obligations on Supra that exceed the scope of discovery allowed by the applicable Florida Rules of Civil Procedure.
6. Supra objects to the "General Instructions" section and the individual discovery items of BellSouth's First Sets of Interrogatories and Request for Production of

Documents to Supra to the extent that the “instructions” purport to seek disclosure of “all” documents, materials or information in Supra’s possession. Supra’s responses will provide all nonprivileged and otherwise discoverable information obtained by Supra after a reasonable and diligent search conducted in connection with the discoveries. Such search will include a review of only those files that are reasonably expected to contain the discovery documents and/or information. To the extent that “instructions” or individual discoveries require more, Supra objects on the ground that compliance would be unduly burdensome, expensive, oppressive, or excessively time consuming, and unnecessary to accomplish BellSouth’s legitimate discovery needs.

7. Supra objects to BellSouth’s First Sets of Interrogatories and Request for Production of Documents to Supra to the extent that the discoveries seeks discovery of materials and/or information protected by attorney/client privilege, the work product doctrine, the accountant/client privilege, or any other applicable privilege.

8. Supra objects to BellSouth’s First Sets of Interrogatories and Request for Production of Documents to Supra to the extent that the discoveries would require disclosure of information that constitutes trade secrets and/or proprietary confidential information and therefore should either not be disclosed at all or should be disclosed only pursuant to the terms of a confidentiality agreement.

9. Supra objects to all discoveries which would require the production of materials and/or information which is already in BellSouth’s possession or is in the public record before the Commission. To duplicate information that BellSouth already has or is readily available to BellSouth would be unduly burdensome and oppressive.

10. Supra objects to BellSouth's First Sets of Interrogatories and Request for Production of Documents to the extent BellSouth seeks to impose an obligation on Supra to respond on behalf of subsidiaries and/or former officers, employees, agents, and directors on the grounds that such discoveries are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

11. Supra is a small corporation that does not have every work function spelled out and with all the smallest details being tracked as other larger corporations would do. Thus, it is possible that a good number of the information that BellSouth may be seeking is not information that Supra currently tracks, monitors, uses, or readily has. Supra will conduct a search of its files and/or systems that are reasonably expected to contain the requested information. To the extent that the First Sets of Interrogatories and Request for Production of Documents purport to require more, Supra objects on the grounds that compliance would impose an undue burden or expense on Supra.