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ORIGINAL

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Tallahassee, FL 32301-5027

October 22, 2003

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COMMISSION  
CLERK

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

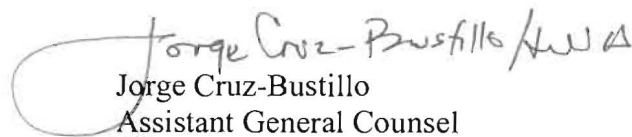
**RE: Docket No. 030852-TP -  
SUPRA'S OBJECTIONS TO BELLSOUTH'S FIRST SET OF  
INTERROGATORIES**

Dear Mrs. Bayo:

Supra Telecommunications and Information Systems, Inc.'s (Supra) Notice of Service of its objections to Bellsouth's First Set Of Interrogatories 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,

  
Jorge Cruz-Bustillo  
Assistant General Counsel

- AUS \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
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- MMS \_\_\_\_\_
- SEC   /
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R. J. P.

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

10437 OCT 22 3

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**

**Docket No. 030852-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 22<sup>nd</sup> day of October 2003 to the following:

*AT&T  
Tracy Hatch  
101 North Monroe Street, Suite 700  
Tallahassee, FL 32301-1549  
Phone: (850) 425-6364  
Fax: 425-6361*

*AT&T Communications of the Southern States, LLC  
Ms. Lisa A. Sapper  
1200 Peachtree Street, N.E., Ste. 8100  
Atlanta, GA 30309-3579  
Phone: (404) 810-7812  
Fax: (832) 213-0268*

*Allegiance Telecom of Florida, Inc.  
Jeffrey J. Binder  
1919 M Street, N.W.  
Washington, DC 20037  
Phone: (202) 464-1792  
Fax: (202) 464-0762*

*Allegiance Telecom, Inc.  
Terry Larkin  
700 East Butterfield Road  
Lombard, IL 60148  
Phone: 630-522-6453*

*BellSouth Telecommunications, Inc.  
R.Lackey/M.Mays/N.White/J.Meza/A.Shore  
c/o Ms. Nancy H. Sims  
150 South Monroe St., Suite 400  
Tallahassee, FL 32301-1556  
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Fax: 222-8640*

*Covad Communications Company  
Mr. Charles E. Watkins  
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Atlanta, GA 30309-3574  
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*Florida Cable Telecommunications Assoc., Inc.  
Michael A. Gross  
246 E. 6th Avenue, Suite 100*

*Tallahassee, FL 32303  
Phone: 850-681-1990  
Fax: 681-9676*

*Florida Competitive Carriers Assoc.  
c/o McWhirter Law Firm  
Joseph McGlothlin/Vicki Kaufman  
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Tallahassee, FL 32301  
Phone: 850-222-2525  
Fax: 222-5606*

*Granite Telecommunications, LLC  
Rand Currier/Geoff Cookman  
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Phone: (617) 847-1500  
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*ITC^DeltaCom  
Nanette Edwards  
4092 South Memorial Parkway  
Huntsville, AL 35802  
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*KMC Telecom III, LLC  
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*MCI WorldCom Communications, Inc.  
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*MCI WorldCom Communications, Inc. (GA)  
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Fax: 222-5606

*Messer Law Firm*  
Floyd Self/Norman Horton  
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Fax: 224-4359

*Miller Isar, Inc.*  
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Gig Harbor, WA 98335  
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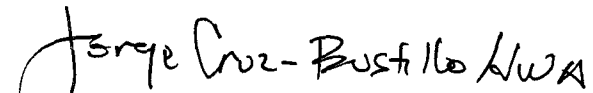
*Sprint-Florida/Sprint Communications  
Company*  
Susan Masterton  
P. O. Box 2214

Tallahassee, FL 32316-2214  
Phone: (850) 599-1560  
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*Verizon Florida Inc.*  
Richard Chapkis/Kimberly Caswell  
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Xspedius Communications  
Ms. Rabinai E. Carson  
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O'Fallon, MO 63366-3868  
Phone: (301) 361-4220  
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SUPRA TELECOMMUNICATIONS  
& INFORMATION SYSTEMS, INC.  
2620 S. W. 27<sup>th</sup> Avenue  
Miami, FL 33133  
Telephone: 305/ 476-4252  
Facsimile: 305/ 443-1078

  
By: Jorge Cruz-Bustillo

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Implementation of requirements )  
Arising from Federal Communications )  
Commission Triennial UNE review: )  
Location Specific-Review for DS1, DS3, )  
and Dark Fiber Loops and Route-Specific )  
Review for DS1, DS3, and Dark Fiber )  
Transport )  
\_\_\_\_\_ )

Docket No. 030852-TP

Filed: October 22, 2003

**SUPRA TELECOMMUNICATIONS AND INFORMATION SYSTEMS, INC.'S  
OBJECTIONS TO BELL SOUTH'S FIRST SET OF INTERROGATORIES (1-13)**

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 Set of Interrogatories and that were propounded by BellSouth on October 15, 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 Set of Interrogatories 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 Set of Interrogatories 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 Set of Interrogatories 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 grounds 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 Set of Interrogatories 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 Set of Interrogatories 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 Set of Interrogatories 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 for production are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.