



ORIGINAL

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December 11, 2003

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

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**RE: Docket No. 030851-TP -  
SUPRA'S OBJECTIONS TO STAFF'S SECOND SETS OF  
INTERROGATORIES (8-11) AND REQUEST FOR PRODUCTION OF  
DOCUMENTS**


Dear Mrs. Bayo:


Supra Telecommunications and Information Systems, Inc.'s (Supra) Notice of Service of its objections to Staff's Second Set 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

  
FPSC-BUREAU OF RECORDS



Jorge Cruz-Bustillo  
Assistant General Counsel

- AUS \_\_\_\_\_
- CAF \_\_\_\_\_
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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 E-mail, Hand Delivery, Facsimile, and/or U.S. Mail this 11<sup>th</sup> day of December 2003 to the following:

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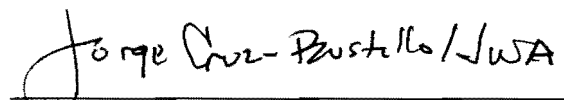
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By: Jorge Cruz-Bustillo

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: December 11, 2003

**SUPRA TELECOMMUNICATIONS AND INFORMATION SYSTEMS, INC.'S  
OBJECTIONS TO STAFF'S SECOND SETS OF INTERROGATORIES (8 - 11)**

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 Staff of the Florida Public Service Commission's ("Staff") Second Set of Interrogatories and Request for Production of Documents ("Set of Discoveries") that were propounded by Staff on December 5, 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.

**GENERAL OBJECTIONS**

Supra makes the following general objections to this Set of Discoveries which will be incorporated by reference into Supra's specific responses when Supra responds to these Interrogatories.

1. Supra objects to the "Definitions" section, the "General Instructions," and the individual discovery items of Staff's Second Set of Interrogatories and Request for Production of Documents to Supra to the extent that they are overly broad, unduly burdensome, and/or oppressive.

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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 Set of 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 Staff’s Second Set 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 Staff’s Second Set 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 Staff's Second Set of Interrogatories and Request for Production of Documents to Supra to the extent that the Interrogatories seek 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 Staff's Second Set 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 Staff's possession or is in the public record before the Commission. To duplicate information that Staff already has or is readily available to Staff would be unduly burdensome and oppressive.
10. Supra objects to Staff's Second Set of Interrogatories and Request for Production of Documents to the extent Staff 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.
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 Staff's First Set of Interrogatories purport to require more, Supra objects on the grounds that compliance would impose an undue burden or expense on Supra.