

ORIGINAL

Legal Department

Nancy B. White  
General Counsel - Florida

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(305) 347-5558

December 23, 2003

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

**Re: Docket No. 030851-TP**

Dear Ms. Bayó:

Today, BellSouth Telecommunications, Inc. served its Objections to Sprint's Second Set of Interrogatories and First Request for Production of Documents to BellSouth.

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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Sincerely,

*Nancy B. White*  
Nancy B. White

cc: All Parties of Record  
Marshall M. Criser III  
R. Douglas Lackey

AUS \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
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**CERTIFICATE OF SERVICE  
Docket No. 030851-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail, Hand Delivery\* and FedEx® this 23<sup>rd</sup> day of December 2003 to the following:

Adam Teitzman, Staff Counsel  
Jason Rojas, Staff Counsel\*  
Jeremy Susac, Staff Counsel  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Phone: (850) 413-6212  
Fax: (850) 413-6250  
[ateitzma@psc.state.fl.us](mailto:ateitzma@psc.state.fl.us)  
[irojas@psc.state.fl.us](mailto:irojas@psc.state.fl.us)  
[jsusac@psc.state.fl.us](mailto:jsusac@psc.state.fl.us)

Michael A. Gross  
VP Reg. Affairs & Reg. Counsel  
Florida Cable Telecomm. Assoc.  
246 East 6th Avenue  
Tallahassee, FL 32303  
Tel. No. (850) 681-1990  
Fax. No. (850) 681-9676  
[mgross@fcta.com](mailto:mgross@fcta.com)

Joseph A. McGlothlin + ⊗  
Vicki Gordon Kaufman~ +  
McWhirter, Reeves, McGlothlin,  
Davidson, Kaufman & Arnold PA  
117 South Gadsden Street  
Tallahassee, FL 32301  
Tel. No. (850) 222-2525  
Fax. No. (850) 222-5606  
Represents FCCA  
Represents Covad ~  
[jmcglothlin@mac-law.com](mailto:jmcglothlin@mac-law.com)  
[vkaufman@mac-law.com](mailto:vkaufman@mac-law.com)

Charles E. Watkins +  
Covad Communications Company  
1230 Peachtree Street, N.E.  
19<sup>th</sup> Floor  
Atlanta, Georgia 30309  
Tel. No. (404) 942-3492  
Fax. No.(404) 942-3495  
[gwatkins@covad.com](mailto:gwatkins@covad.com)  
[jbelle@covad.com](mailto:jbelle@covad.com)

Nanette Edwards, Esq.+  
Director – Regulatory  
ITC^DeltaCom  
4092 S. Memorial Parkway  
Huntsville, AL 35802  
Tel. No. (256) 382-3856  
[nedwards@itcdeltacom.com](mailto:nedwards@itcdeltacom.com)

Floyd Self, Esq. + ⊗  
Norman H. Horton, Esq. ~  
Messer Caparello & Self  
215 South Monroe Street, Suite 701  
Tallahassee, FL 32301  
Tel. No. (850) 222-0720  
Fax. No. (850) 224-4359  
Represents ITC^DeltaCom,  
Represents KMC  
Represents MCI  
Represents Xspedius~  
[fself@lawfla.com](mailto:fself@lawfla.com)  
[nhorton@lawfla.com](mailto:nhorton@lawfla.com)

De O'Roark, Esq. +  
MCI WorldCom Communications, Inc.  
6 Concourse Parkway, Suite 3200  
Atlanta, GA 30328  
[de.oroark@mci.com](mailto:de.oroark@mci.com)

Jon Moyle, Jr.  
Moyle Law Firm (Tall)  
The Perkins House  
118 North Gadsden Street  
Tallahassee, FL 32301  
Phone: (850) 681-3828  
Fax: 681-8788  
Email: [jmoylejr@moylelaw.com](mailto:jmoylejr@moylelaw.com)

Andrew O. Isar  
Miller Isar, Inc.  
7901 Skansie Avenue  
Suite 240  
Gig Harbor, WA 98335  
Tel. No. (253) 851-6700  
Fax No. (253) 851-6474  
[aisar@millerisar.com](mailto:aisar@millerisar.com)

Jason Spinard, Esq.  
Rand Currier  
Geoff Cookman  
Granite Telecommunications, LLC  
234 Copeland Street  
Quincy, MA 02169  
Tel. No. 617 847-1500  
Fax No. 617 847-0931  
[jspinard@granitenet.com](mailto:jspinard@granitenet.com)  
[rcurrier@granitenet.com](mailto:rcurrier@granitenet.com)  
[gcookman@granitenet.com](mailto:gcookman@granitenet.com)

Donna McNulty, Esq. +⊗  
MCI WorldCom Communications, Inc.  
1203 Governors Square Blvd., Suite 201  
Tallahassee, FL 32301-2960  
[donna.mculty@mci.com](mailto:donna.mculty@mci.com)

Tracy Hatch, Esq.  
AT&T  
101 North Monroe Street  
Suite 700  
Tallahassee, FL 32301  
Tel. No. (850) 425-6360  
[thatch@att.com](mailto:thatch@att.com)

Lisa A. Sapper +  
AT&T  
1200 Peachtree Street, N.E.  
Suite 8100  
Atlanta, GA 30309  
Tel. No. (404) 810-7812  
[lisariley@att.com](mailto:lisariley@att.com)

Jake E. Jennings +  
NewSouth Communications Corp  
Two North Main Center  
Greenville, SC 29601-2719  
Tel. No. 864 672-5877  
Fax No. 864 672-5313  
[jejennings@newsouth.com](mailto:jejennings@newsouth.com)

Marva Brown Johnson, Esq.  
KMC Telecom III, LLC  
1755 North Brown Road  
Lawrenceville, GA 30034-8119  
[marva.johnson@kmctelecom.com](mailto:marva.johnson@kmctelecom.com)

Susan S. Masterton, Esq. + ⊗  
Sprint-Florida, Inc.  
Sprint Communications Co. L.P.  
1313 Blair Stone Road  
P.O. Box 2214  
Tallahassee, FL 32316-2214  
Tel. No. (850) 599-1560  
Fax. No. (850) 878-0777  
[susan.masterton@mail.sprint.com](mailto:susan.masterton@mail.sprint.com)

Charles V. Gerkin, Jr.  
Regulatory Counsel  
Allegiance Telecom, Inc.  
9201 North Central Expressway  
Dallas, TX 75231  
Phone: 469-259-4051  
Fax: 770 234-5945  
Cell: 770 855-0466  
[charles.gerkin@algx.com](mailto:charles.gerkin@algx.com)

Terry Larkin  
Allegiance Telecom, Inc.  
700 East Butterfield Road  
Lombard, IL 60148  
Phone: (630) 522-6453  
[terry.larkin@algx.com](mailto:terry.larkin@algx.com)

Jean Houck  
Business Telecom, Inc.  
4300 Six Forks Road  
Raleigh, NC 27609  
Tel. No. (919) 863-7325  
[jean.houck@btitelecom.net](mailto:jean.houck@btitelecom.net)

Jonathan Audu  
Manager, Regulatory Affairs  
Supra Telecommunications  
1311 Executive Center Drive  
Suite 220  
Tallahassee, FL 32301-5027  
Tel. No. (850) 402-0510  
Fax. No. (850) 402-0522  
[jonathan.audu@stis.com](mailto:jonathan.audu@stis.com)

Margaret Ring, Director  
Regulatory Affairs  
Network Telephone Corporation  
815 S. Palafox St.  
Pensacola, FL 32501  
850-465-1748  
[Margaret.Ring@networktelephone.net](mailto:Margaret.Ring@networktelephone.net)

Tier 3 Communications  
Kim Brown  
2235 First Street, Suite 217  
Ft. Myers, FL 33901-2981  
Phone: (239) 689-0000  
Fax: (239) 689-0001  
Email: [steve@tier3communications.net](mailto:steve@tier3communications.net)

Jorge Cruz-Bustillo +  
Assistant General Counsel  
Supra Telecommunications & Information  
Systems, Inc.  
2620 S.W. 27th Avenue  
Miami, FL 33133  
Phone: (305) 476-4252  
Fax: (305) 443-1078  
[jorge.cruz-bustillo@stis.com](mailto:jorge.cruz-bustillo@stis.com)

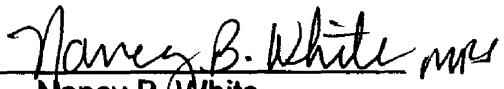
**AT&T by E-Mail only: +**  
[soniadaniels@att.com](mailto:soniadaniels@att.com)

Richard Chapkis/Kimberly Caswell  
Verizon Florida Inc.  
P.O. Box 110, FLTC0007  
Tampa, FL 33601-0110  
Phone: (813) 483-1256  
Fax: (813) 273-9825  
Email: [richard.chapkis@verizon.com](mailto:richard.chapkis@verizon.com)

Matthew Feil (+)  
Scott Kassman  
FDN Communications  
390 North Orange Avenue  
Suite 2000  
Orlando, FL 32801-1640  
Tel. No. 407 835-0460  
Fax No. 407 835-0309  
[mfeil@mail.fdn.com](mailto:mfeil@mail.fdn.com)  
[skassman@mail.fdn.com](mailto:skassman@mail.fdn.com)

Thomas M. Koutsky  
Vice President, Law and Public Policy  
Z-Tel Communications, Inc.  
1200 19<sup>th</sup> Street, N.W., Ste. 500  
Washington, D.C. 20036  
Tel. No. (202) 955-9653  
[tkoutsky@z-tel.com](mailto:tkoutsky@z-tel.com)

Charlie Beck  
Deputy Public Counsel  
Office of Public Counsel  
111 West Madison Street, Room 812  
Tallahassee, FL 32399-1400

  
Nancy B. White

**(+ )signed Protective Agreement**  
**(\*) via Hand Delivery**  
**(⊗) via FedEx**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising	)	
from Federal Communications Commission	)	Docket No. 030851-TP
triennial UNE review: Local Circuit Switching	)	
for Mass Market Customers.	)	Filed: December 23, 2003
	)	

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**BELLSOUTH TELECOMMUNICATIONS, INC.'S OBJECTIONS TO SPRINT'S  
SECOND INTERROGATORIES (NOS. 2-5) AND  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-27)**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.340 and 1.280, Florida Rules of Civil Procedure, hereby files the following General Objections to Sprint Communications Limited Partnership and Sprint-Florida's (hereinafter "Sprint"), Second Set of Interrogatories (Nos. 2-5) and First Request for Production of Documents (Nos. 1-27), dated December 16, 2003.

The objections stated herein are preliminary in nature. Should additional grounds for objection be discovered as BellSouth prepares its answers to the above-referenced interrogatories and request for production of documents, BellSouth reserves the right to supplement, revise, or modify its objections at the time it serves its responses.

**GENERAL OBJECTIONS**

1. BellSouth objects to the interrogatories and requests for production to the extent they seek to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such interrogatories and requests for production are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. Specifically, Sprint defines BellSouth to include, in relevant part, "subsidiaries, and affiliates, including, but not limited to, Cingular Wireless . . . ." BellSouth will not be

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responding to discovery that seeks information from affiliate companies or from Cingular, an entity in which BellSouth Corporation is a shareholder.

2. BellSouth objects to the interrogatories to the extent they are intended to apply to matters other than those subject to the jurisdiction of the Commission. BellSouth objects to such interrogatories as being irrelevant, overly broad, unduly burdensome, and oppressive.

3. BellSouth objects to each and every interrogatory and instruction to the extent that such request or instruction calls for information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. BellSouth objects to each and every interrogatory insofar as the interrogatories and requests are vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these interrogatories. Any answers provided by BellSouth in response to the interrogatories will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth objects to each and every interrogatory insofar as it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. BellSouth will attempt to note in its responses each instance where this objection applies.

6. BellSouth objects to providing information to the extent that such information is already in the public record before the Commission.

7. BellSouth objects to Sprint's discovery requests, instructions and definitions, insofar as they seek to impose obligations on BellSouth that exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

8. BellSouth objects to each and every interrogatory insofar as any of them are unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. BellSouth is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, BellSouth 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. Therefore, it is possible that not every document has been identified in response to these requests. BellSouth will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the requests purport to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

10. BellSouth objects to each and every interrogatory to the extent that the information requested constitutes “trade secrets” pursuant to Section 90.506, Florida Statutes. To the extent that Sprint requests proprietary confidential business information, BellSouth will make such information available in accordance with a protective agreement, subject to any other general or specific objections contained herein.

11. BellSouth objects to any discovery request that seeks to obtain “all” of particular documents, items, or information to the extent that such requests are overly broad and unduly burdensome. Any answers provided by BellSouth in response to this discovery will be provided subject to, and without waiver of, the foregoing objection.

12. BellSouth also objects to any interrogatory or request to the extent that it seeks confidential information that BellSouth cannot disclose under the FCC’s Customer Proprietary Network Information (“CPNI”) rules, 47 CFR §64.2007 or under protective agreements with



CLECs to which BellSouth is a party. BellSouth will only provide CPNI and CLEC confidential information consistent with the FCC's rules and BellSouth-executed protective agreements.

Respectfully submitted this 23<sup>rd</sup> day of December, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE

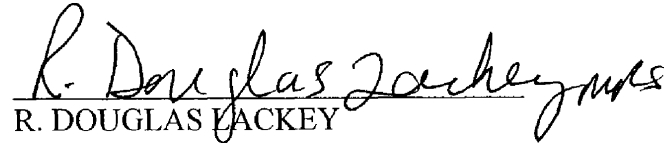
JAMES MEZA III

c/o Nancy H. Sims

150 So. Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558



R. DOUGLAS LACKEY

MEREDITH E. MAYS

ANDREW D. SHORE

Suite 4300

675 W. Peachtree St., NE

Atlanta, GA 30375

(404) 335-0765