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December 29, 2003

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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 Staff's Fourteenth Set of Interrogatories, 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.

Sincerely,



Daniel McCuaig

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cc: All Parties of Record  
Charles Schubart

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### **GENERAL OBJECTIONS**

1. Verizon FL objects to each 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 is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. Verizon FL objects to each 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 as being irrelevant, overly broad, unduly burdensome, and oppressive.

3. Verizon FL objects to each 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 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.

5. Verizon FL objects to each 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.

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 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 Interrogatory to the extent that responding to it would be unduly burdensome, expensive, oppressive, or excessively time consuming.

9. Verizon FL objects to each 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 Interrogatories purport to require more, Verizon FL objects on the grounds that compliance would impose an undue burden or expense.

**INITIAL SPECIFIC OBJECTIONS: FOURTEENTH INTERROGATORIES**

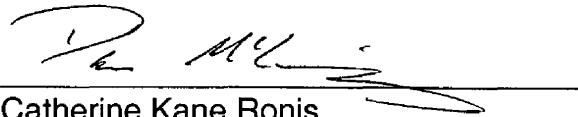
In addition to the foregoing general objections, Verizon FL raises the following initial specific objections to the following individual interrogatories in Staff's Fourteenth Interrogatories:

**251.**

- (a) Has Verizon adopted SFAS 143, Accounting for Asset Retirement Obligations, for financial reporting purposes?**
- (b) If the response to (a) is affirmative, when did Verizon adopt SFAS 143 for financial reporting purposes?**

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Interrogatory on the grounds that Verizon FL has already responded to a "Staff Interrogatory No. 251." See Verizon Florida Inc.'s Responses to Staff's Thirteenth Set of Interrogatories (Nos. 244-251). This Interrogatory is not identical to the first "Staff Interrogatory No. 251," and thus represents a violation of the sequential numbering requirement of the Order Establishing Procedure. See Order No. PSC-02-1513-PCO-TP, at 4 (Nov. 4, 2002). Notwithstanding and without waiving this or any other objection, Verizon FL will denote this second "Staff Interrogatory No. 251" as "251(II)" in its response, in an attempt to limit confusion.

Respectfully submitted,



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Dated: December 29, 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 e-mail this 29th day of December, 2003 to the following (with service via FedEx or regular U.S. Mail to follow).

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C. Lee Fordham, Staff Counsel  
Adam Teitzman, Staff Counsel  
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Cheryl Bulecza-Banks  
David Dowds  
Jackie Schindler  
Jason-Earl Brown  
Laura King; Bob Casey  
Pat Lee; Stephanie Cater  
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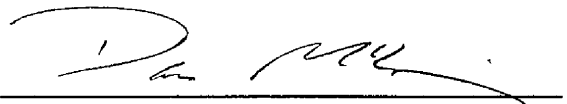
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