

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of Petition of KMC Telecom III)
LLC, KMC Telecom V, Inc., and KMC Data)
LLC for Arbitration of an Interconnection)
Agreement with Sprint- Florida, Incorporated)

Docket No. 031047-TP
Filed: August 12, 2004

**SPRINT'S MOTION TO ACCEPT LATE-FILED
DISCOVERY OBJECTIONS**

COMES NOW Sprint-Florida, Incorporated ("Sprint") and files this Motion requesting that the Commission, through the Prehearing Officer, accept Sprint's Late-filed Discovery Objections. In support Sprint states as follows:

1. KMC served Sprint with its Second Interrogatories and Second Request for Production of Documents via e-mail on July 30, 2004.
2. Pursuant to the Order on Procedure, Order No. PSC-04-0563-PCO-TP, parties are required to file objections to discovery within 10 days following service of a discovery request. The purpose of the 10-day time frame, as stated in the Order on Procedure, is "to reduce delay in resolving discovery disputes." Sprint's objections were due on August 9, 2004.
3. Undersigned counsel for Sprint was out of the office during the time frame the objections were due and inadvertently overlooked the filing deadline.
4. Upon realizing the oversight, counsel has promptly prepared and filed separately Sprint's objections and served them on the parties via electronic mail. Responses to the discovery are due on August 19, 2004, leaving the parties ample time to resolve any issues raised by the objections. In addition, Sprint intends to timely file its

DOCUMENT NUMBER-DATE

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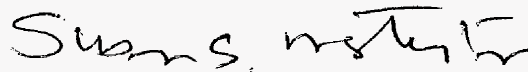
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responses to the discovery, subject to the objections, on August 19, 2004, as required by the Order on Procedure.

5. In accordance with Rule 28-106.203, F.A.C., Sprint has notified the parties of its intent to file this motion. Because these objections are in nature, because the parties have sufficient time prior to the due date of responding to attempt to resolve any issues raised by the objections and because late-filing of the objections will not delay the filing of Sprint's responses to KMC's discovery requests, Sprint asserts that no party will be prejudiced by the granting of this Motion.

WHEREFORE, for the above reasons, Sprint requests that the Commission accept Sprint's late-filed discovery objections.

RESPECTFULLY SUBMITTED this 12th day of August 2004.



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