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*Benjamin W. Fincher*  
Attorney, State Regulatory

**VIA AIRBORNE**

January 4, 1996

ORIGINAL  
FILE 0092

Ms. Blanca S. Bayó  
Director, Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

In Re: Resolution of petition(s) to establish nondiscriminatory rates, terms, and conditions for resale involving local exchange companies and alternative local exchange companies pursuant to Section 364.161, Florida Statutes; Docket Nos. 950984-TP, 950984A-TP and 950984B-TP.

Dear Ms. Bayó:

Enclosed for filing, the original and 16 copies of Sprint Communications Company Limited Partnership's Objections to BellSouth Telecommunications, Inc.'s First Set of Interrogatories and First Request for Production of Documents. in the above captioned proceeding. Please date stamp the additional copy and return to me in the enclosed self addressed stamped envelope.

Thank you in advance for your cooperation.

Sincerely,

*Benjamin W. Fincher*  
Benjamin W. Fincher  
Attorney, State Regulatory

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cc: All Parties of Record  
BellSouth

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Resolution of petition(s) to establish )  
nondiscriminatory rates, terms, and conditions ) Docket No. 950984-TP  
for resale involving local exchange ) Docket No. 950984A-TP  
companies and alternative local exchange ) Docket No. 950984B-TP  
companies pursuant to Section 364.161, )  
Florida Statutes. )  
\_\_\_\_\_ )  
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Filed: January 4, 1996

**ORIGINAL  
FILE COPY**

**SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP'S  
OBJECTIONS TO BELLSOUTH TELECOMMUNICATIONS, INC.'S  
FIRST SET OF INTERROGATORIES  
AND  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Comes now Sprint Communications Company Limited Partnership ("Sprint"), pursuant to Rules 25-22.034 and 25-22.035, Florida Administrative Code, and Rules 1.340 and 1.280(b), Florida Rules of Civil Procedure, and hereby submits the following objections to the First Set of Interrogatories and First Request for Production of Documents of BellSouth Telecommunications, Inc. ("BellSouth").

The objections stated herein are preliminary in nature and are submitted at this time for the purpose of complying with the procedural schedule in this docket.

**GENERAL OBJECTIONS**

Sprint makes the following General Objections to BellSouth's First Set of Interrogatories and First Request for Production of Documents which are incorporated herein by reference into specific responses.

1. Sprint objects to each and every interrogatory to the extent it is intended to elicit responses on behalf of subsidiaries, affiliates, or other persons not a party to this proceeding on the grounds that such requests are overly broad, unduly burdensome, oppressive, and not permitted by applicable rules of discovery.

2. Sprint objects to each and every interrogatory to the extent it seeks information with respect to matters outside the State of Florida on the grounds that such

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interrogatory is not relevant to this proceeding, is overly broad, unduly burdensome, and oppressive.

3. Sprint objects to each and every interrogatory to the extent the request is vague, ambiguous, overly broad, imprecise, or utilizes terms that not properly defined or explained, and are not subject to any reasonable interpretation.

4. Sprint objects to each and every interrogatory to the extent the request is not relevant to any issue in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

5. Sprint objects to each and every interrogatory to the extent the request seeks to impose obligations which exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

6. Sprint objects to each and every interrogatory to the extent the request seeks information that would be unduly burdensome, expensive, oppressive, or excessively time consuming to compile.

#### SPECIFIC OBJECTIONS TO INTERROGATORIES

1. Sprint objects to this interrogatory on the grounds that it seeks information that is not relevant to any issue in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Further, the interrogatory is overly broad and unduly burdensome.

2. Sprint objects to this interrogatory on the grounds that it seeks information that is not relevant to any issue in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Further, the interrogatory is overly broad and unduly burdensome.

3. Sprint objects to this interrogatory on the grounds that it seeks information that is not relevant to any issue in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Further, the interrogatory is overly broad and unduly burdensome.

4. Sprint objects to this interrogatory on the grounds that (1) the request is vague, ambiguous and is not susceptible to any reasonable interpretation; (2) the request

is overly broad, burdensome and oppressive; (3) the request seeks information that is confidential and privileged; (4) the request seeks information that is not relevant to any issue in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

5. Sprint objects to this interrogatory on the grounds that it seeks information that is not relevant to any issue in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Further, the request is overly broad, burdensome and oppressive.

6. Sprint objects to this interrogatory on the grounds that it seeks information that is not relevant to any issue in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Further, the request is overly broad, burdensome, oppressive and seeks information that is confidential and proprietary..

7. Sprint objects to this interrogatory on the grounds that it seeks information that is not relevant to any issue in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence..

8. Sprint objects to this interrogatory on the grounds that it seeks information that is not relevant to any issue in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

9. Sprint objects to this interrogatory on the grounds that it seeks information that is not relevant to any issue in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Further, the request is overly broad, burdensome and oppressive.

10. Sprint objects to this interrogatory on the grounds that it seeks information that is not relevant to any issue in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

11. Sprint objects to this interrogatory on the grounds that it seeks information that is not relevant to any issue in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.

## SPECIFIC OBJECTIONS TO REQUEST FOR PRODUCTION OF DOCUMENTS

1. Sprint objects to this production request on the grounds that the request relates to matters not relevant to any issue in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Further, the production request is overly broad, unduly burdensome and oppressive.

2. Sprint objects to this production request on the grounds that the request relates to matters not relevant to any issue in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Further, the production request is overly broad, unduly burdensome and oppressive.

3. Sprint objects to this production request on the grounds that the request relates to matters not relevant to any issue in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Further, the production request is overly broad, unduly burdensome, oppressive, vague and ambiguous and is not subject to any reasonable interpretation.

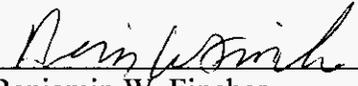
4. Sprint objects to this production request on the grounds that the request relates to matters not relevant to any issue in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Further, the production request is overly broad, unduly burdensome, oppressive, vague and ambiguous and is not subject to any reasonable interpretation.

5. Sprint objects to this production request on the grounds that the request relates to matters not relevant to any issue in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Further, the production request is overly broad, unduly burdensome, oppressive, vague and ambiguous and is not subject to any reasonable interpretation. Moreover, the request seeks information that is confidential and proprietary.

6. Sprint objects to this production request on the grounds that it is vague and ambiguous.

Respectfully submitted this 4th day of January, 1996.

Sprint Communications Company Limited Partnership

By:  \_\_\_\_\_  
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## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true and exact copy of the within and foregoing on behalf of Sprint Communications Company Limited Partnership via United States mail, postage paid and properly addressed to the following:

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This 4th day of January, 1996.

Lisa Sammons  
Lisa Sammons  
Sprint Communications Company  
Limited Partnership