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February 9, 1996

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IN REPLY REFER TO:
Tallahassee

BY HAND DELIVERY

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

Re: Resolution of Petition to Establish Non
Discriminatory Rates, Terms, and Conditions
for Interconnection Involving Local Exchange
Companies and Alternative Local Exchange
Companies pursuant to Section 364.162,
Florida Statutes - Docket No. 950985-TP

Dear Ms. Bayo:

Enclosed for filing in the above-styled docket are the original and fifteen (15) copies of Central Telephone Company of Florida and United Telephone Company of Florida's Objections to MFS of Florida, Inc.'s First Set of Interrogatories and Motion for Protective Order.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

- ACK
- AFA _____
- APP *with 2/15*
- CAF _____
- CAF *(initials)*
- CAF _____
- CAF _____
- CAF _____
- LFC JJW/csu
- LIS Enclosures
- CPC _____
- RCM _____ utd\950985.byo
- SEC
- WAS _____
- OTH _____

Thank you for your assistance in this matter.

Sincerely,

J. Jeffrey Wahlen
J. Jeffrey Wahlen

cc: All parties of record

SEARCHED
(initials)
INDEXED
(initials)

DOCUMENT NUMBER-DATE

01596 FEB-96

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of Petition to) DOCKET NO. 950985-TP
Establish Non Discriminatory Rates,) Filed: 2/09/96
Terms, and Conditions for Inter-)
connection Involving Local Exchange))
Companies and Alternative Local)
Exchange Companies pursuant to)
Section 364.162, Florida Statutes)
_____)

**CENTRAL TELEPHONE COMPANY OF FLORIDA AND
UNITED TELEPHONE COMPANY OF FLORIDA'S
OBJECTIONS TO MFS OF FLORIDA, INC.'S FIRST SET
OF INTERROGATORIES AND MOTION FOR PROTECTIVE ORDER**

United Telephone Company of Florida ("Sprint/United") and Central Telephone Company of Florida ("Sprint/Centel") (collectively "Sprint-United/Centel" or the "Companies"), pursuant to Rule 25-22.034, Florida Administrative Code, Florida Rule of Civil Procedure 1.350, and Order No. PSC-95-1084-PCO-TP, issued on August 30, 1995, hereby submits the following Objections and Motion for Protective Order with respect to MFS of Florida's First Set of Interrogatories to Sprint-United/Centel, served on January 30, 1996 ("MFS's First Set").

Preface

The objections are being made for the purpose of complying with the Order on Prehearing Procedure in this docket. The Companies have made a good faith effort to identify any and all objections they may have to MFS's First Set, but reserve the right to raise additional objections up to the time of their answers if the need for additional objections becomes apparent while preparing the answers. If it becomes necessary to raise

DOCUMENT NUMBER-DATE

01596 FEB-98

FPSC-RECORDS/REPORTING1535

additional objections, the Companies will promptly file those objections and notify counsel for MFS of the basis for the objection.

General Objections

The Companies make the following general objections to MFS's First Set. These general objections apply to each of the individual interrogatories in MFS's First Set, whether or not a specific objection is raised, and to MFS's First Set in its entirety, and are incorporated in the specific objections below as though fully set forth therein.

1. The Companies have interpreted MFS's First Set to apply to the Companies' regulated intrastate operations in Florida and will limit their responses accordingly. To the extent that any interrogatory is intended to apply to matters other than the Florida intrastate operations subject to the jurisdiction of the Commission, the Companies object on the basis that such interrogatories are irrelevant, overly broad, unduly burdensome and oppressive.

2. The Companies object to each and every interrogatory to the extent that such requests call for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege or other applicable privilege. To the extent that the Companies identify privileged information during the preparation of the answers to MFS's First Set, they will, without waiving any applicable privilege, disclose the nature of

the information and the basis for the claim of privilege to counsel for MFS.

3. The Companies object to each and every interrogatory insofar as the interrogatories are vague, ambiguous, overly broad, duplicative, imprecise or utilize terms that are subject to multiple interpretations but are not properly defined or explained for purposes of the interrogatories. Any answer provided by the Companies will be provided subject to, and without waiver of, the foregoing objection.

4. The Companies object to each and every interrogatory insofar as the interrogatories are not reasonably calculated to lead to the discovery of admissible evidence, are not relevant to the subject matter of this action, and are beyond the scope of discovery as described in Florida Rule of Civil Procedure 1.280. The Companies will attempt to note each instance where this objection applies.

5. The Companies object to producing answers, documents, records and information to the extent that such information is already in the public record before the Florida Public Service Commission, or is equally available to MFS from some other source.

6. The Companies object to each and every interrogatory, and all of the interrogatories taken together, insofar as they are unduly burdensome, expensive, oppressive, or excessively time-consuming to answer as written.

7. The Companies object to each and every interrogatory to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that the interrogatories seek proprietary confidential business information which is not subject to the "trade secrets" privilege, the Companies will make such information available to counsel for MFS pursuant to a mutually acceptable Protective Agreement, subject to any other general or specific objections contained herein. The Companies have attempted to identify all instances where confidential information has been requested, but reserve the right to claim additional information as confidential if the need to do so becomes apparent while preparing the answers to MFS's First Set.

8. The Companies object to the definition of "you," "your" and "Sprint-United/Centel" on grounds that the definition of these terms is overbroad and would cause the Companies' search for the information requested to be burdensome.

9. The Companies object to MFS's First Set in its entirety on grounds that they were not properly served on the Company in accordance with Florida Rule of Civil Procedure 1.080(b). This rule requires that service on a party represented by counsel be made on that party's counsel. The Notice of Service filed by counsel for MFS in this docket reflects that MFS's First Set was not served on counsel for the Companies.

10. The Companies object to each of the interrogatories to the extent that they are presented as a request for production of

documents, not an interrogatory, and cannot be answered under oath as required by Florida Rule of Civil Procedure 1.340. Moreover, those requests do not specify a time or place for production. To the extent that the Companies elect to produce documents to MFS, it will do so at the offices of its counsel or at the offices of the Companies, at a mutually agreeable time and date. Alternatively, if the documents to be produced are not voluminous, the Companies reserve the right to mail them to counsel for MFS.

Motion for Protective Order

The Companies submit their objections to MFS's First Set pursuant to the authority contained in Slatnik v. Leadership Housing Systems of Florida, Inc., 368 So.2d 79 (Fla. 3d DCA 1979). To the extent that a Motion for Protective Order is required, the objections set forth herein are to be construed as a request for protective order.

Specific Objections

2. Does Sprint-United/Centel currently utilize different tandem switching systems in Florida for local traffic than for switched access traffic? If the answer to this question is affirmative, then respond to the following:
 - a. Does Sprint-United/Centel currently provide any other common carriers with interconnection to its local tandem switches?
 - b. If so, which common carriers are provided such interconnection and under what rates, terms, and conditions?

Objection: In addition to the general objections stated above, the Companies object to part (b) of this question on grounds that it calls for information that the Companies believe is proprietary confidential business information. Without waiving this objection, the Companies will provide the answer to MFS pursuant to a mutually acceptable Non-Disclosure Agreement executed between the MFS and the Companies.

5. **When did Sprint-United/Centel file its last cost study with the Florida Public Service Commission? Please provide this cost study.**

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to the last sentence of this interrogatory on grounds that it is presented as a request for production of documents, not an interrogatory, and cannot be answered under oath as required by Florida Rule of Civil Procedure 1.340. Additionally, the Companies object to the last sentence of this question on grounds that it calls for information that the Companies believe is proprietary confidential business information.

7. With regard to the costs referred to in question 5 above:
- a. Please show the long run incremental cost, or other cost calculations developed, of carrier switched access for the originating end of the call, the terminating end of the call and for a call switched on both ends.
 - b. Please provide the long run incremental cost or, if long run incremental costs are not calculated, other costs in Interrogatory 7(a) above desegregated by rate elements to the degree those costs were developed separately, e.g., the cost of switching and transport.

Objection: In addition to the general objections stated above, the Companies object to this question on grounds that it calls for information that the Companies believe is proprietary confidential business information. Without waiving this objection, the Companies will provide the answer to MFS pursuant to a mutually acceptable Non-Disclosure Agreement executed between the MFS and the Companies.

9. What is the percentage of two-way vs. one-way Sprint-United/Centel trunks used to transport carrier switched access traffic in Florida?

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to this interrogatory on grounds that it calls for information that is not relevant to any of the issues in this docket, is not calculated to lead to the discovery of admissible evidence in this docket and is beyond the scope of discovery in this docket. Likewise, the Companies object to this interrogatory on grounds that performing the analysis necessary to answer would be

burdensome. The Companies do not compile the requested information in the ordinary course of business and it would take a significant amount of manual work to compile.

10. **How many one-way trunks does Sprint-United/Centel currently have engineered that carry voice and data traffic between Sprint-United/Centel offices and other service provider offices (local and interexchange carrier ("IXC")) in Florida?**

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to this interrogatory on grounds that it calls for information that is not relevant to any of the issues in this docket, is not calculated to lead to the discovery of admissible evidence in this docket and is beyond the scope of discovery in this docket. Likewise, the Companies object to this interrogatory on grounds that performing the analysis necessary to answer would be burdensome. The Companies do not compile the requested information in the ordinary course of business and it would take a significant amount of manual work to compile.

11. **How many two-way trunks does Sprint-United/Centel currently have engineered that carry voice and data traffic between Sprint-United/Centel offices and other service provider offices (local and IXC)?**

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to this interrogatory on grounds that it calls for information that is not relevant to any of the

issues in this docket, is not calculated to lead to the discovery of admissible evidence in this docket and is beyond the scope of discovery in this docket. Likewise, the Companies object to this interrogatory on grounds that performing the analysis necessary to answer would be burdensome. The Companies do not compile the requested information in the ordinary course of business and it would take a significant amount of manual work to compile.

12. **Does the separate business unit referred to in question 8 charge Sprint-United/Centel for residence and business listings for telephone directories, directory databases and E911 databases?**
 - a. **If so, what are the non-recurring and recurring charges?**
 - b. **Does the separate business unit referred to in question 8 compensate Sprint-United/Centel for Sprint-United/Centel customer information, for residence and business listings, or for directory or E911 data base updates?**
 - c. **If so, describe the compensation arrangement. Please provide any agreements, contracts, quotes, etc.**

Objection: In addition to the general objections stated above, the Companies object to part (c) of this interrogatory on grounds that it is presented as a request for production of documents, not an interrogatory, and cannot be answered under oath as required by Florida Rule of Civil Procedure 1.340. Additionally, the Companies object to this question on grounds that it calls for information that may not be in the Companies' possession, custody or control, and that the Companies believe is proprietary

confidential business information. To the extent available and without waiving this objection, the Companies will provide an answer to MFS pursuant to a mutually acceptable Non-Disclosure Agreement executed between the MFS and the Companies.

13. Is Sprint-United/Centel willing to facilitate the listing of competitive local exchange carriers' end offices into the LERG? If the answer to this question is affirmative, then respond to the following:
- a. Does this include entering the competitive local exchange carriers' information into the Routing Data Base System (RDBS)?
 - b. Please describe the specific actions Sprint-United/Centel would take to facilitate such listings.
 - c. Does any procedure exist by which a competitive local exchange carrier can cause its end office information to be entered in the RDBS and listed in the LERG without "facilitation" by Sprint-United/Centel? If so, please describe this procedure.
 - d. Please quantify the administrative costs that Sprint-United/Centel expects to incur to perform this function.

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to this interrogatory on grounds that performing the analysis necessary to answer part (d) would be burdensome. The Companies do not maintain the requested information in the ordinary course of business and it would take a significant amount of manual work to gather the requested information. Moreover, until a detailed administrative plan has been developed, it would be difficult to quantify the related administrative costs.

14. Please state separately, for each Sprint-United/Centel access tandem in Florida, and each other tandem (if any) identified in response to question 2, above, the following information:
- a. The number of carriers other than Sprint-United/Centel (including other local exchange carriers, commercial mobile radio service providers, interexchange carriers, and all other providers of intrastate, interstate, or foreign telecommunications services) that are connected to each tandem, either through purchase of Sprint-United/Centel switched access services or through any other interconnection arrangement.
 - b. The number of distinct physical points of termination or points of interconnection associated with all of the carriers identified in (a) above.

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to this interrogatory on grounds that it calls for information that is not relevant to any of the issues in this docket, is not calculated to lead to the discovery of admissible evidence in this docket and is beyond the scope of discovery in this docket. Likewise, the Companies object to this interrogatory on grounds that performing the analysis necessary to answer would be burdensome. The Companies do not compile the requested information in the ordinary course of business and it would take a significant amount of manual work to compile. Additionally, the Companies object to this question on grounds that it calls for proprietary marketing and network information that the Companies believe is proprietary confidential business information, that should not be provided at the Companies' expense to a competitor.

15. Please provide the following information with respect to 911 emergency services:
- a. Who is Sprint-United/Centel's customer at present for Basic 911 service? For E911 service?
 - b. What rates and charges does Sprint-United/Centel impose at present for Basic 911 service? For E911 service?
 - c. How is Basic 911 service currently funded in Florida? Please include both the sources and amounts of any funds used to support this service, including both direct and indirect funding.
 - d. How is E911 service currently funded in Florida? Please include both the sources and amounts of any funds used to support this service, including both direct and indirect funding.
 - e. What are Sprint-United/Centel's E911 costs?
 - f. What is Sprint-United/Centel's best estimate of the monthly cost of E911 per telephone number in the E911 database?

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to parts (c) and (d) of this interrogatory on grounds that it calls for information that is not in the possession of the Companies, or is equally available to MFS.

In addition, parts (a), (c) and (d) call for information that is not relevant to any of the issues in this docket, is not calculated to lead to the discovery of admissible evidence in this docket and is beyond the scope of discovery in this docket. Parts (e) and (f) call for information that is not readily available, would be burdensome to produce and is proprietary confidential business information.

16. **Please list all regulated services or rate elements offered by Sprint-United/Centel in Florida for which the price is less than the marginal cost.**

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to this interrogatory on grounds that performing the analysis necessary to answer would be burdensome. The Companies do not routinely perform "marginal cost" studies for any of their regulated services and no such studies are available.

17. **Please provide copies of all studies prepared by or for Sprint-United/Centel, whether or not previously filed with the Commission, relating to the marginal costs, or if marginal cost studies are unavailable other cost basis, of any dial tone line services in Florida.**

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies objects to this interrogatory on grounds that it is presented as a request for production of documents, not an interrogatory, and cannot be answered under oath as required by Florida Rule of Civil Procedure 1.340. Additionally, the Companies object to this question on grounds that it calls for information that the Companies believe is proprietary confidential business information. Without waiving these objection, the Companies will provide costs for R-1 and B-1 services to MFS pursuant to a mutually acceptable Non-Disclosure Agreement executed between the MFS and the Companies.

23. Provide all cost studies relating to Sprint-United/Centel's provision of directory publishing and directory assistance services.

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to this interrogatory on grounds that it is presented as a request for production of documents, not an interrogatory, and cannot be answered under oath as required by Florida Rule of Civil Procedure 1.340. By way of explanation, and without waiving this objection, the Companies state that they do not have the requested cost studies and, to the extent that this question requests the Companies to perform such studies, they object to the question on grounds that doing so would be burdensome. The Companies do not maintain the requested information in the ordinary course of business and it would take a significant amount of time and effort to gather the requested information. Additionally, the Companies object to this question on grounds that it calls for information that the Companies believe is proprietary confidential business information.

26. If the answer to MFS-FL Interrogatory No. 2 (First Set) is affirmative, has Sprint-United/Centel computed the marginal cost of tandem switching and common transport for, or if marginal cost studies are unavailable other cost basis, calls routed through local tandem switches separately from the marginal or other costs for calls routed through access tandem switches? If so, please provide all cost studies containing this data.

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies objects to this interrogatory on grounds that it is presented as a request for production of documents, not an interrogatory, and cannot be answered under oath as required by Florida Rule of Civil Procedure 1.340. Additionally, the Companies object to this question on grounds that it calls for information that the Companies believe is proprietary confidential business information.

27. What percentage of Sprint-United/Centel's total local calls (originating and terminating between Sprint-United/Centel end user subscribers) are direct trunked between end offices?

- a. What is the average transport distance (in miles) for these calls?
- b. What is the marginal cost, or if marginal cost studies are unavailable other cost basis, of originating and terminating these calls? The marginal cost, or if marginal cost studies are unavailable other cost basis, of switching? The marginal cost, or if marginal cost studies are unavailable other cost basis, of transport?

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to this interrogatory on grounds that performing the analysis necessary to answer would be

burdensome. Local calls are not recorded for all customers, and the data is not available to calculate the requested percentages. Route mileage is available for each route; however, to summarize and calculate the requested averages would require a significant amount of manual work. The Companies do not routinely perform the "marginal cost" studies requested, and have not done so for this docket. Even if the requested studies were available, the Companies would object to this question on grounds that it calls for information that the Companies believe is proprietary confidential business information. The Company has, however, performed a long run incremental cost study for switching and will make the results of that study available to MFS pursuant to a mutually acceptable Non-Disclosure Agreement executed between the MFS and the Companies.

28. What percentage of Sprint-United/Centel's total local calls (originating and terminating between Sprint-United/Centel end user subscribers) originate and terminate from the same end office switch?
- a. What percentage originate and terminate from the same Serving Wire center
 - b. What is the average transport distance (in miles) for these calls?
 - c. What is the marginal cost, or if marginal cost studies are unavailable other cost basis, of originating and terminating these calls? The marginal cost, or if marginal cost studies are unavailable other cost basis, of switching? The marginal cost, or if marginal cost studies are unavailable other cost basis, of transport?

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to this interrogatory on grounds that performing the analysis necessary to answer would be burdensome. Local calls are not recorded for all customers, and the data is not available to calculate the requested percentages. Route mileage is available for each route; however, to summarize and calculate the requested averages would require a significant amount of manual work. The Companies do not routinely perform the "marginal cost" studies requested, and have not done so for this docket. Even if the requested studies were available, the Companies would object to this question on grounds that it calls for information that the Companies believe is proprietary confidential business information. The Company has, however, performed a long run incremental cost study for switching and will make the results of that study available to MFS pursuant to a mutually acceptable Non-Disclosure Agreement executed between the MFS and the Companies.

29. **What percentage of Sprint-United/Centel's total intraLATA calls (originating and terminating between Sprint-United/Centel end user subscribers) are direct trunked between end offices?**

a. **What is the average transport distance (in miles) for these calls?**

b. **What is the marginal cost, or if marginal cost studies are unavailable other cost basis, of originating and terminating these calls? The marginal cost, or if marginal cost studies are unavailable other cost basis, of switching? The marginal cost, or if marginal cost studies are unavailable other cost basis, of transport?**

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to this interrogatory on grounds that performing the analysis necessary to answer would be burdensome. IntraLATA calls are recorded for billing, but there is no data base that associates the calls with the trunk group/routes they transverse. Due to traffic conditions, some calls may overflow direct trunk groups and complete via tandem switching. There is no economic way to measure and assimilate the requested data. The Companies do not routinely perform the "marginal cost" studies requested, and have not done so for this docket. Even if the requested studies were available, the Companies would object to this question on grounds that it calls for information that the Companies believe is proprietary confidential business information. The Company has, however, performed a long run incremental cost study for switching and will make the results of that study available to MFS pursuant to a mutually acceptable Non-Disclosure Agreement executed between the MFS and the Companies.

30. **What percentage of Sprint-United/Centel's total intraLATA calls (originating and terminating between sprint-United/Centel end user subscribers) are routed through a single access tandem? Single Sector Tandem?**
- a. **What is the average transport distance (in miles) for these calls?**
- b. **What is the marginal cost, or if marginal cost studies are unavailable other cost basis, of originating and**

terminating these calls? The marginal cost, or if marginal cost studies are unavailable other cost basis, of switching? The marginal cost, or if marginal cost studies are unavailable other cost basis, of transport?

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to this interrogatory on grounds that performing the analysis necessary to answer would be burdensome. IntraLATA calls are recorded for billing, but there is no data base that associates the calls with the trunk group/routes they transverse. Due to traffic conditions, some calls may overflow direct trunk groups and complete via tandem switching. There is no economic way to measure and assimilate the requested data. The Companies do not routinely perform the "marginal cost" studies requested, and have not done so for this docket. Even if the requested studies were available, the Companies would object to this question on grounds that it calls for information that the Companies believe is proprietary confidential business information. The Company has, however, performed a long run incremental cost study for switching and will make the results of that study available to MFS pursuant to a mutually acceptable Non-Disclosure Agreement executed between the MFS and the Companies.

31. What percentage of Sprint-United/Centel's total intraLATA calls (originating and terminating between Sprint-United/Centel end user subscribers) are routed through two or more access tandems/sector tandems?
- a. What is the average transport distance (in miles) for these calls?
 - b. What is the marginal cost, or if marginal cost studies are unavailable other cost basis, of originating and terminating these calls? The marginal Sprint-United/Centel cost, or if marginal cost studies are unavailable other cost basis, of switching? The marginal cost, or if marginal cost studies are unavailable other cost basis, of transport?
 - c. If so, what are the non-recurring and recurring charges? Please provide per element detail, including per page cost, and any contracts, agreements, quotes, etc.

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to this interrogatory on grounds that performing the analysis necessary to answer would be burdensome. IntraLATA calls are recorded for billing, but there is no data base that associates the calls with the trunk group/routes they transverse. Due to traffic conditions, some calls may overflow direct trunk groups and complete via tandem switching. There is no economic way to measure and assimilate the requested data. The Companies do not routinely perform the "marginal cost" studies requested, and have not done so for this docket. Even if the requested studies were available, the Companies would object to this question on grounds that it calls for information that the Companies believe is proprietary confidential business information. The Company has, however, performed a long run

incremental cost study for switching and will make the results of that study available to MFS pursuant to a mutually acceptable Non-Disclosure Agreement executed between the MFS and the Companies.

34. **How many end office, sector tandem, and access tandem switches does Sprint-United/Centel operate in Florida?**

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to this interrogatory on grounds that it calls for information that is not relevant to any of the issues in this docket, is not calculated to lead to the discovery of admissible evidence in this docket and is beyond the scope of discovery in this docket. Moreover, the requested information is proprietary confidential business information. Without waiving these objection, the Companies will provide the requested information to MFS pursuant to a mutually acceptable Non-Disclosure Agreement executed between the MFS and the Companies.

35. a. **Does Sprint-United/Centel have any plans to reduce the number of end office switches or serving wire centers?**
b. **If so, why? Please provide any plans or schedules referring or relating to such reduction plans.**

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to this interrogatory on grounds that it calls for information that is not relevant to any of the

issues in this docket, is not calculated to lead to the discovery of admissible evidence in this docket and is beyond the scope of discovery in this docket. Even if the requested information was relevant, the Companies would object to this question on grounds that it calls for information that the Companies believe is proprietary confidential business information.

36. **What percentage of Sprint-United/Centel's network is copper-based? What percentage is fiber-based?**
- a. **For each of the following, please provide the percentage and number of lines that are copper-based vs. fiber-based:**
- i. **Inter-switch trunks.**
 - ii. **End office to end user commercial buildings.**
 - iii. **End office to end user residence dwelling units. Please provide a breakdown by single family and multi-united dwellings.**
 - iv. **End office to end user businesses.**
 - v. **End office to end user residence customers.**
- b. **Does Sprint-United/Centel plan to replace its copper facilities with fiber optic facilities? Please provide any plans and schedules referring or relating to such replacement for each of the categories listed in subpart a.**

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to this interrogatory on grounds that it calls for information that is not relevant to any of the issues in this docket, is not calculated to lead to the discovery of admissible evidence in this docket and is

beyond the scope of discovery in this docket. While the Companies can and will provide broad measures of the percentages of copper and fiber in their networks, the Companies object to this interrogatory on grounds that performing the analysis necessary to answer part (a) would be burdensome. In the normal course of business, the Companies do not compile the statistics requested in part (a) of this interrogatory. It would take hundreds of hours to perform the studies and compile the statistics requested. Even if all of the requested information was relevant, the Companies would object to this question on grounds that it calls for information that the Companies believe is proprietary confidential business information. The Companies will provide the broad measures of percentages of copper v. fiber pursuant to a mutually acceptable Non-Disclosure Agreement executed between the MFS and the Companies.

As far as part (b) is concerned, the Companies object to this interrogatory on grounds that it is presented as a request for production of documents, not an interrogatory, and cannot be answered under oath as required by Florida Rule of Civil Procedure 1.340. Moreover, while the companies may have detailed plans in this area, those detailed plans are voluminous, are located at various locations of the Companies, and include proprietary

confidential business information. Gathering this information would be burdensome. To the extent that the information can be gathered and produced to MFS, it will only be done pursuant to a mutually acceptable Non-Disclosure Agreement executed between the MFS and the Companies.

37. **What local line and usage services does Sprint-United/Centel offer?**
- a. **Please provide a list and detailed description of each service.**
 - b. **Please provide Sprint-United/Centel's average revenue per minute and cost per minute of use for each service listed.**

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to part (b) of this interrogatory on grounds that performing the analysis necessary to answer would be burdensome. In the normal course of business, the Companies do not maintain the specific statistics requested in part (b) of this interrogatory. It would take hundreds of hours to perform the studies and gather the statistics requested. Even if the requested studies were available, the Companies would object to this question on grounds that it calls for information that the Companies believe is proprietary confidential business information. The Company has, however, performed a long run incremental cost study for switching and will make the results of that study

available to MFS pursuant to a mutually acceptable Non-Disclosure Agreement executed between the MFS and the Companies.

38. **What are Sprint-United/Centel's revenues and uncollectibles booked to the first and second level accounting classifications (e.g., Account 5010.1 and 5010.11)?**

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to this interrogatory on grounds that it calls for information that is not relevant to any of the issues in this docket, is not calculated to lead to the discovery of admissible evidence in this docket and is beyond the scope of discovery in this docket. Likewise, the Companies object to this interrogatory on grounds that the requested information is proprietary confidential business information.

39. **What are Sprint-United/Centel's billed local conversation minutes for 1994? If available, these usage data should be specified in terms of business, residence and public telephone local usage as well as any other relevant classifications maintained by Sprint-United/Centel in the ordinary course of business.**

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to this interrogatory on grounds that it calls for information that is not relevant to any of the issues in this docket, is not calculated to lead to the discovery of admissible evidence in this docket and is

beyond the scope of discovery in this docket. Likewise, the Companies object to this interrogatory on grounds that the requested information is proprietary confidential business information. By way of explanation, and without waiving these objections, the Companies note that local minutes are not recorded for all customers, and the data is not available to calculate this requested data.

42. Please state, by month, from January 1994 to present, the following information regarding Sprint-United/Centel's intrastate local exchange operations:
- a. The total number of calls, separately stated by local exchange calls and intraLATA toll calls, for
 - i. Business customers
 - ii. Residential Customers
 - b. The average number of calls made in a month, separately stated by local exchange calls and intraLATA toll calls, for
 - i. Business customers
 - ii. Residential Customers
 - c. The average length of call, separately stated by local exchange calls and intraLATA toll calls, for
 - i. Business customers
 - ii. Residential Customers
 - d. The total minutes of use, separately stated by local exchange calls and intraLATA toll calls, for
 - i. Business customers
 - ii. Residential Customers

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the

Companies object to this interrogatory on grounds that it calls for information that is not relevant to any of the issues in this docket, is not calculated to lead to the discovery of admissible evidence in this docket and is beyond the scope of discovery in this docket. Likewise, the Companies object to this interrogatory on grounds that performing the analysis necessary to answer would be burdensome. Local calls are not recorded for all customers, and the data is not available to calculate the requested data. While IntraLATA calls are recorded for billing, the details of the residence v. business split is not readily available. It would take hundreds of hours of manual and data processing work to perform the studies and gather the statistics requested. Likewise, the Companies object to this interrogatory on grounds that the requested information is proprietary confidential business information.

43. **Please state, by month, from January 1994 to present, the following information regarding Sprint-United/Centel's local exchange operations:**
- a. **The total number of business customers, separately stated by service type (i.e., flat rate service, measured rate service).**
 - b. **The total number of residence customers, separately stated by service type (i.e., flat rate service, measured rate service).**

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to this interrogatory on grounds that it calls for information that is not relevant to any of the

issues in this docket, is not calculated to lead to the discovery of admissible evidence in this docket and is beyond the scope of discovery in this docket. Likewise, the Companies object to this interrogatory on grounds that the requested monthly information is proprietary confidential business information. The requested information on a total company basis as of the end of 1994 is available in the files of the Florida Public Service Commission.

47. Please list by rate element all access (interconnection) charges that an ALEC would incur (per minute) in terminating a local exchange call to Sprint-United/Centel under Sprint-United/Centel's proposal and, for each such element:
- a. Set forth the amount, if any, of contribution included in the charge; and
 - b. Please list, separately for residential and business customers, Sprint-United/Centel's charge to its own end users to terminate a local exchange call.

Objection: In addition to the general objections stated above, the Companies object to part (a) of this question on grounds that it calls for information that the Companies believe is proprietary confidential business information. Without waiving this objection, the Companies will provide an answer to MFS pursuant to a mutually acceptable Non-Disclosure Agreement executed between the MFS and the Companies.

48. Please state whether or not Sprint-United/Centel's residential dial tone line service is priced below marginal cost, or if marginal cost studies are unavailable other cost basis, and set forth, for such service:

- a. **Sprint-United/Centel's rate; and**
- b. **Sprint-United/Centel's marginal cost, or if marginal cost studies are unavailable other cost basis.**

Objection: In addition to the general objections stated above, the Companies object to this question on grounds that it calls for information that the Companies believe is proprietary confidential business information. Without waiving this objection, the Companies will provide the answer to MFS pursuant to a mutually acceptable Non-Disclosure Agreement executed between the MFS and the Companies.

49. **Please list all other services which Sprint-United/Centel prices below their marginal cost, or if marginal cost studies are unavailable other cost basis, and for each such service provide:**

- a. **The marginal cost, or if marginal cost studies are unavailable other cost basis, to Sprint-United/Centel of such service; and**
- b. **The price Sprint-United/Centel charges for such service.**

Objection: In addition to the general objections stated above, the Companies object to this question on grounds that it calls for information that the Companies believe is proprietary confidential business information. Without waiving this objection, the Companies will provide the answer to MFS pursuant to a mutually acceptable Non-Disclosure Agreement executed between the MFS and the Companies.

53. a. Does Sprint-United/Centel propose to offer to ALECs toll and assist operator services in the instance where the ALEC has its own switches?
- b. What arrangement does Sprint-United/Centel have with other Florida LECs and ALECs with regard to the provision of these services? Please provide a copy of such contract or a written summary if the arrangement is oral.

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to the last sentence in part (b) of this interrogatory on grounds that it is presented as a request for production of documents, not an interrogatory, and cannot be answered under oath as required by Florida Rule of Civil Procedure 1.340. The Companies object to the first sentence of part (b) of this question on grounds that it calls for information that the Companies believe is proprietary confidential business information. Without waiving this objection, the Companies will provide the answer to MFS pursuant to a mutually acceptable Non-Disclosure Agreement executed between the MFS and the Companies.

54. Does Sprint-United/Centel include listings of customers of any other Florida LEC and/or ALEC in its white pages directories? Please describe the terms and conditions upon which it does so and please provide a copy of any contract.

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to the last sentence of this interrogatory on grounds that it is presented as a request for production of documents, not an interrogatory, and cannot be answered

under oath as required by Florida Rule of Civil Procedure 1.340. The Companies object to the portion calling for the terms and conditions on grounds that it calls for information that the Companies believe is proprietary confidential business information. Without waiving this objection, the Companies will provide the answer to MFS pursuant to a mutually acceptable Non-Disclosure Agreement executed between the MFS and the Companies.

55. **What arrangement does Sprint-United/Centel have with other Florida LECs or ALECs local exchange carriers with regard to the provision of directory assistance services? Please provide a copy of such contract or a written summary if the arrangement is oral.**

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to this interrogatory on grounds that it is presented as a request for production of documents, not an interrogatory, and cannot be answered under oath as required by Florida Rule of Civil Procedure 1.340. The Companies object to the portion calling for the "arrangements" on grounds that it calls for information that the Companies believe is proprietary confidential business information. Without waiving this objection, the Companies will provide the answer to MFS pursuant to a mutually acceptable Non-Disclosure Agreement executed between the MFS and the Companies.

56. **Please provide copies of all studies, not previously produced in this docket, that support Sprint-United/Centel's mutual compensation recommendations.**

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to this interrogatory on grounds that it is presented as a request for production of documents, not an interrogatory, and cannot be answered under oath as required by Florida Rule of Civil Procedure 1.340. If this was framed as an interrogatory, the Companies would respond that they have no studies.

57. **Please provide copies of any studies that Sprint-United/Centel has that address the issue of terminating traffic flow between Sprint-United/Centel and potential ALECs or between other incumbent LECs and new entrants to switched local exchange markets.**

Objection: In addition to the general objections stated above, the Companies object to this question on grounds that it is presented as a request for production of documents, not an interrogatory, and cannot be answered under oath as required by Florida Rule of Civil Procedure 1.340. In addition, it calls for information that the Companies believe is proprietary confidential business information. Without waiving these objection, the Companies will provide the requested information to MFS pursuant to a mutually acceptable Non-Disclosure Agreement executed between the MFS and the Companies.

58. Please provide a list of the business units of Sprint-United/Centel at present, including all affiliates of Sprint-United/Centel operating in Florida, and indicate which of these units are regulated and which are not. If, for instance, an operation such as the yellow pages is considered a single business unit by the Company, please break out the regulated and unregulated aspects of any such operation. For the regulated units, please indicate the regulatory body or bodies with oversight responsibilities for that unit.

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to this interrogatory on grounds that it calls for information that is not relevant to any of the issues in this docket, is not calculated to lead to the discovery of admissible evidence in this docket and is beyond the scope of discovery in this docket.

59. Please produce copies of all interconnection agreements, not previously produced in this docket, that are currently in place between Sprint-United/Centel and other carriers and competitors. If certain terms and conditions of interconnection between Sprint-United/Centel and the other carrier or competitor are only subject to oral agreements, please provide a written summary of all such terms and conditions.

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to this interrogatory on grounds that it is overbroad and does not identify the requested information with specificity enough to enable the Companies perform a reasonable search for the requested information. In addition, the Companies object to this question on grounds that it is presented as a request for production of

documents, not an interrogatory, and cannot be answered under oath as required by Florida Rule of Civil Procedure 1.340. Likewise, the Companies object to this interrogatory on grounds that performing the search necessary to answer would be burdensome. Likewise, the Companies object to this interrogatory on grounds that the requested information is the proprietary confidential business information of the Companies and other carriers, which, in some cases, cannot be produced to third parties like MFS without the permission of the other carrier. However, by way of explanation, at this point in time, Sprint-United/Centel has no local interconnection agreements for dial tone.

60. **Please identify all categories of cost which the implementation of Remote Call Forwarding number portability as described in the number portability docket (Docket No. 950737-TP) would entail for Sprint-United/Centel and produce any cost studies for each such category of cost.**

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to this interrogatory on grounds that it calls for information that is not relevant to any of the issues in this docket, is not calculated to lead to the discovery of admissible evidence in this docket and is beyond the scope of discovery in this docket. In addition, the Companies object to this question on grounds that it is presented as a request for production of documents, not an

interrogatory, and cannot be answered under oath as required by Florida Rule of Civil Procedure 1.340.

61. **Please identify all third party providers of printed white page directories that are willing to provide such directories in Florida.**

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to this interrogatory on grounds that it calls for information that is not in the possession of the Companies, and that is equally available to MFS in the market place. In light of the general availability of this information, it would be burdensome to require the Companies to collect this information on behalf of one of its competitors.

62. **Please identify all enhancements that Sprint-United/Centel would have to make its directory assistance and operator service systems to enable third party access and provide any studies regarding the cost of any such enhancements.**

Objection: In addition to the general objections stated above, the Companies object to this question on grounds that it is presented as a request for production of documents, not an interrogatory, and cannot be answered under oath as required by Florida Rule of Civil Procedure 1.340. In addition, it calls for information that the Companies believe is proprietary confidential business information. Without waiving these objection, the Companies will provide the requested information to MFS pursuant to a mutually

acceptable Non-Disclosure Agreement executed between the MFS and the Companies.

67. **Please provide any and all agreements between Sprint-United/Centel and other Florida LECs regarding the exchange of local traffic. If no agreements are in writing, please state and describe, including a description of all terms and conditions, any oral or non-written agreement.**

Objection: In addition to the general objections stated above, the Companies object to this question on grounds that it is presented as a request for production of documents, not an interrogatory, and cannot be answered under oath as required by Florida Rule of Civil Procedure 1.340. In addition, this question calls for information that the Companies believe is proprietary confidential business information. Without waiving these objections, the Companies will provide a response to MFS pursuant to a mutually acceptable Non-Disclosure Agreement executed between MFS and the Companies.

70. **Please provide any and all data in your possession, custody or control reflecting whether distribution of local and toll traffic was affected by a change in local calling area (i.e., When a local calling area was increased, did customers begin to make more calls to the exchanges that were previously toll, but now local? When a local calling area was decreased, did customers begin to make fewer calls to the exchanges that were previously local, but now toll?) Such data should, to the extent available, cover a period extending from two years before the change in local calling area until two years after the change in local calling area.**

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the

Companies object to this interrogatory on grounds that it is overbroad ("any and all" and does not specify a time period), calls for information that is not relevant to any of the issues in this docket, is not calculated to lead to the discovery of admissible evidence in this docket and is beyond the scope of discovery in this docket. Likewise, the Companies object to this interrogatory on grounds that performing the analysis necessary to answer would be burdensome. In the normal course of business, the Companies do not maintain the statistics requested in this interrogatory. Even if the raw data is available in some form, it would take hundreds of hours to perform the studies and gather the statistics requested.

72. **Please provide the per-unit cost to Sprint-United/Centel of producing white pages directories in the most recent year for which data is available.**

Objection: In addition to the general objections stated above, the Companies object to this question on grounds that it calls for information that the Companies believe is proprietary confidential business information. Without waiving this objection, the Companies will provide the answer to MFS pursuant to a mutually acceptable Non-Disclosure Agreement executed between the MFS and the Companies.

73. Please state whether Sprint-United/Centel will concede that its per-unit cost of producing white pages directories would be at least twice as great if it were to produce only 100, instead of the number set forth in your answer to question 71. If your answer is other than an unqualified "yes," please explain.

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to this interrogatory on grounds that they do not have the information at their disposal to answer this question, and even if they did, performing the analysis necessary to answer would be burdensome. The question does not define how "cost" should be defined, and how cost is defined would have a significant bearing on the per unit cost and the time necessary to compute it.

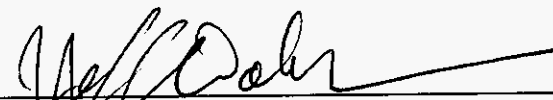
74. Please set forth Sprint-United/Centel's average monthly revenues from providing access services, for the most recent period for which such data are available, for:

- a. Residential customers and
- b. Lifeline customers.

Objection: In addition to the general objections set forth above, which are incorporated herein by reference, the Companies object to this interrogatory on grounds that performing the analysis necessary to answer would be burdensome. In the normal course of business, the Companies do not maintain the separate statistics for "residential" and "Lifeline" customers as requested in this interrogatory. Even if the raw data is available, which it is not, it would

take hundreds of hours to perform the studies and gather the statistics requested. Likewise, the Companies object to this interrogatory on grounds that the requested information is proprietary confidential business information.

DATED this 9th day of February, 1996.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) or overnight express (**) this 9th day of February, 1996, to the following:

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