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February 26, 1996

HAND DELIVERED

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FILE COPY

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IN REPLY REFER TO:

Tallahassee

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 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; FPSC Docket No. 950985-TP

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Central Telephone Company of Florida and United Telephone Company of Florida's Objections to Continental's First Request for Production of Documents and 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 same to this writer.

Thank you for your assistance in connection with this matter.

Sincerely,

*J. Jeffrey Wahlen*  
J. Jeffrey Wahlen

- ACK
- AFA
- APP
- CAF
- CMR  Chase
- CTR
- EAG
- LEG  JJW/pp
- LIN  5
- OPC
- RCH
- SEC
- WAS
- OTH

Enclosures

cc: All Parties of Record (w/enc.)

DOCUMENT NUMBER-DATE  
02324 FEB 26 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: 02/26/96  
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 CONTINENTAL'S FIRST REQUEST FOR  
PRODUCTION OF DOCUMENTS and 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 1.340, and the Procedural Order in this Docket, hereby submit the following Objections and Motion for Protective Order with respect to Continental Cablevision, Inc.'s ("Continental") First Set of Interrogatories ("Continental's First Set") and First Request for Production of Documents ("Continental's First POD"), which were served by overnight delivery on February 16, 1996.

**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

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objections they may have to Continental's First Set and First POD, but reserve the right to raise additional objection up to the time of their answers if the need for additional objections becomes apparent while preparing their answers and responses. If it becomes necessary to raise additional objections, the Companies will promptly file those objections and notify counsel for Continental of the basis for the objection.

**General Objections to Continental's First Set**

The Companies make the following general objections to Continental's First Set. These general objections apply to each of the individual interrogatories in Continental's First Set, whether or not a specific objection is raised, and to Continental'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 Continental'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 Continental'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 Continental.

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 Continental 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 Continental 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 Continental's First Set.

**Specific Objections to Continental's First Set**

1. The Companies object to Interrogatories Nos. 1 through 4 on grounds that the answers to these interrogatories, if any, will likely contain proprietary confidential business information. To the extent the Companies have information to put in an answer, the Companies will provide answers to these interrogatories to Continental on a confidential basis pursuant to a mutually acceptable non-disclosure agreement.

General Objections to Continental's First POD

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

1. The Companies have interpreted Continental's First POD to apply to the Companies' regulated intrastate operations in Florida and will limit their responses accordingly. To the extent that any request 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 requests are irrelevant, overly broad, unduly burdensome and oppressive.

2. The Companies object to each and every request 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 response to Continental's First POD, they will, without waiving any applicable privilege, disclose the nature of the information and the basis for the claim of privilege to counsel for Continental.

3. The Companies object to each and every request insofar as the requests 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 requests. Any response or documents provided by the Companies will be provided subject to, and without waiver of, the foregoing objection.

4. The Companies object to each and every request insofar as the requests 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 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 Continental from some other source.

6. The Companies object to each and every request, and all of the requests 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 request 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 requests seek proprietary confidential business information which is not subject to the "trade secrets" privilege, the Companies will make such

information available to counsel for Continental 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 response to Continental's First POD.

**Specific Objections to Continental's First POD**

1. The Companies object to Request Nos. 1 through 5 on grounds that the documents responsive to these interrogatories, if any, may likely contain proprietary confidential business information. To the extent the Companies have confidential documents responsive to these requests, the Companies will provide those confidential documents to Continental on a confidential basis pursuant to a mutually acceptable non-disclosure agreement.

2. The Companies object to Request No. 5 for the reasons contained in the Companies' Objections to MCImetros's First Request for Production of Documents, dated February 10, 1996, which objections are incorporated herein by reference as though fully stated herein.

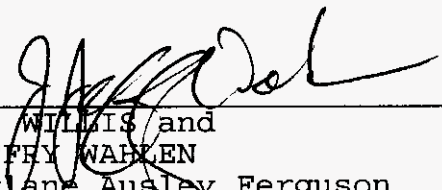
**Motion for Protective Order**

The Companies submit their objections to Continental's First Set and First POD 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.

DATED this 26th day of February, 1996.



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ATTORNEYS FOR UNITED TELEPHONE  
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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 delivery (\*\*) this 26th day of February, 1996, to the following:

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