

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the Cost of  
Local Telecommunications Service,  
pursuant to Section 364.025, Florida  
Statutes

) DOCKET NO. 980696-TP  
) FILED: July 17, 1998  
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**OBJECTIONS OF SPRINT-FLORIDA, INC. TO  
AT&T'S FIRST SET OF INTERROGATORIES AND  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Sprint-Florida, Inc. ("Sprint"), by and through its undersigned attorneys, submits its Objections to AT&T Communications of the Southern States, Inc.'s (AT&T) First Set of Interrogatories (1-36) ("AT&T's 1st Interrogatories") and First Request for Production of Documents (1-16) (AT&T's 1st PODs"), stating as follows:

General Objections

1. Sprint objects to each of AT&T's 1st Interrogatories and AT&T's 1st PODs on the grounds that they relate to a cost proxy model which Sprint has not yet proposed in any filing with this Commission. That Sprint may have filed such a cost proxy model, or any cost proxy model, with the Federal Communications Commission/State Joint Board, or with any other state regulator, is not dispositive. The fact remains that until Sprint has in fact filed a cost proxy model with this Commission in this proceeding, AT&T's 1st Interrogatories and AT&T's 1st PODs are premature. No such discovery should take place until after Sprint has filed its cost proxy model. To do otherwise would place an unreasonable burden on Sprint to redirect limited resources from completing the

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filing required on August 3, 1998, to complete discovery which must be responded to by July 30, 1998. AT&T has proffered no basis for why it must have this data even before it has seen Sprint's filing.

2. Sprint is, however, willing to respond to AT&T's 1st Interrogatories and 1st PODs, if otherwise not objectionable, 10 days following Sprint's August 3, 1998, direct testimony filing in this proceeding. At that time, the full nature of Sprint's filing will be known. Sprint's Responses to be filed on August 13, 1998, will provide AT&T with sufficient time to prepare its rebuttal testimony scheduled to be filed on September 2, 1998.

#### Specific Objections

3. Sprint has the following specific objections to certain of AT&T's 1st Interrogatories and AT&T's 1st PODs. Additionally, Sprint retains the right to file additional objections once it files its direct testimony and exhibits relating to its proposed cost-proxy model.

#### Interrogatories

4. Sprint objects to AT&T's 1st Interrogatory No. 2 on the grounds that it calls for information which is proprietary, confidential business information.

5. Sprint objects to A&T's 1st Interrogatory No. 8 on the grounds that Sprint is a price regulated company and the requested information is not relevant. Additionally, requiring Sprint to extract eight years of historical data is burdensome and, in any event, is not relevant to a forward-looking cost study.

6. Sprint objects to AT&T's 1st Interrogatory No. 21 on the

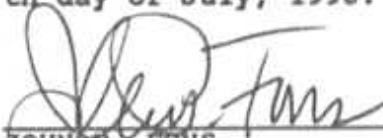
Production of Documents

12. Sprint objects to AT&T's 1st POD No. 2 on the same grounds as stated in its objection to AT&T's 1st Interrogatory No. 2.

13. Sprint objects to AT&T's 1st POD No. 9 on the same grounds as stated in its objection to AT&T's 1st Interrogatory No. 8.

14. Sprint objects to AT&T's 1st POD No. 14 on the same grounds as stated in its objection to AT&T's 1st Interrogatory No. 27.

Respectfully submitted this 17th day of July, 1998.

  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand delivery (\*) this 17th day of July, 1998, to the following:

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