

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Discovery and related study on fair)
and reasonable rates and on relationships)
among costs and charges associated)
with certain telecommunications services)
provided by local exchange companies)
(LECs), as required by Chapter 98-277,)
Laws of Florida.)

Docket 980733-TL
Filed August 5, 1998

FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
TO SPRINT-FLORIDA BY FLORIDA LEGAL SERVICES

Florida Legal Services ("FLS") requests that Sprint-Florida produce the following
documents for inspection and copying at the office of Florida Legal Services, 2121 Delta
Boulevard, Tallahassee, FL 32303, on or before Monday, August 17, 1998, by U.S. mail or other
means, or at such other time and place as may be mutually agreed upon by counsel.

INSTRUCTIONS

1. If any document is withheld under any claim of privilege, please furnish a list identifying
each document for which privilege is claimed, together with the following information: date,
sender, recipients, recipients of copies, subject matter of the document, and the basis upon which
such privilege is claimed.

- ACK
AFA 2
APP
CAF 3
CMU
CTR
EAG
LEG
LIN
OPC
RCH
SEC 1
WAS
OTH

Please produce complete copies of the originals of the documents requested.

3. Please construe "and" as well as "or" either disjunctively or conjunctively as necessary to
bring within the scope of this production of documents any document which might otherwise be
construed to be outside the scope.

DOCUMENT NUMBER-DATE
08372 AUG-6 88
FPSC-RECORDS/REPORTING

4. Words in the past tense include the present, and words in the present tense include the past. Use of the singular includes the plural, and use of the masculine includes the feminine where appropriate, and vice versa.

DEFINITIONS

1. "Document" or "documents" means any written, recorded, filmed or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device or any other media, including, but not limited to, memoranda, notes, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, and notes, any of which are in your possession, custody, or control.

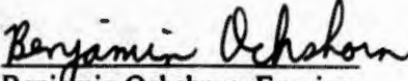
2. As used herein, "you" and "your" means Sprint-Florida together with its officers, employees, consultants, agents, representatives, attorneys (unless privileged), and any other person or entity acting for or on behalf of Sprint-Florida.

DOCUMENTS REQUESTED

1. All documents requested of Sprint-Florida by letters dated June 19, 1998, from Walter D'Haeseleer and Tom Devlin of the Florida Public Service Commission to all local exchange companies regarding 980000A-SP, undocketed special project, fair and reasonable rates.

2. All documents requested of Sprint-Florida by the First Request for Production of Documents to Sprint-Florida by the Attorney General and the Citizens of Florida, dated June 19, 1998.

Respectfully submitted,


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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of the foregoing Request for Production of Documents were served by U.S. Mail to Charles J. Rehwinkel, Sprint-Florida, Inc., 1313 Blairstone Road, MC FLTH00107, Tallahassee, FL 32316; and that a true and correct copy was provided by U.S. Mail this 5th day of August, 1998, to:

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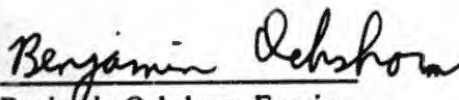
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