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RECORDS AND REPORTING

November 18, 1999

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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: Docket No. 990649-TP

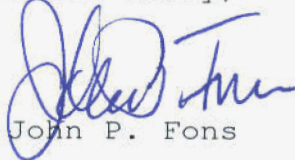
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Sprint's Objection to Staff's Second Set of Interrogatories and Second Request for Production of Documents.

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

Thank you for your assistance in this matter.

Yours truly,



John P. Fons

Enclosures

cc: All parties of record

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- QTH _____

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into
pricing of unbundled network
elements

DOCKET NO. 990649-TP
FILED: November 18, 1999

**SPRINT'S OBJECTION TO STAFF'S SECOND
SET OF INTERROGATORIES AND SECOND
REQUEST FOR PRODUCTION OF DOCUMENTS**

Pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.280, 1.340 and 1.350 Florida Rules of Civil Procedure, Sprint Communications Company Limited Partnership and Sprint-Florida, Incorporated (collectively "Sprint") objects to Staff's Second Set of Interrogatories ("Interrogatories") - No. 3(a) and Staff's Second Request for Production of Documents ("PODs") - No. 7, stating as follows:

1. Staff's Interrogatory No. 3(a) refers to witness Dickerson's rebuttal testimony (page 19, lines 7-12) and asks:

"(a) Which ILEC, in what states and proceedings, use cable fill factors designed to negate the need for bridged pairs and propose a nonrecurring charge to remove bridge taps?"

POD No. 7 simply asks for all documents used to support the response to Interrogatory No. 3(a).

2. Mr. Dickerson's statement in his rebuttal testimony, which is the subject of Interrogatory No. 3(a),

DOCUMENT NUMBER-DATE

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refers to his personal experience in reviewing ILEC cost studies in UNE arbitration proceedings and in negotiations. Consequently, the names of the ILECs are confidential because disclosure of the names could hamper Sprint's ability to negotiate with such ILECs. See Section 364.183(3)(d). Additionally, the data upon which Mr. Dickerson is relying is cost study data which Sprint was only allowed to review under a claim of confidentiality by the providers, but was not allowed to take possession of. See Section 364.183(3)(e). Consequently, Sprint is unable to furnish the requested cost study information.

3. Sprint is, however, prepared to furnish the requested names of the ILECs to Staff under a claim of confidentiality pursuant to Rule 25-22.006(3), Florida Administrative Code, by filing a notice of intent to request confidential classification.

DATED this 18th day of November, 1999.

Respectfully submitted,

CHARLES J. REHWINKEL
Sprint-Florida, Inc.
P. O. Box 2214
Tallahassee, Florida 32316
(850) 847-0244

and

A handwritten signature in black ink, appearing to read "John P. Fons", is written over a horizontal line.

JOHN P. FONS
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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 18th day of November, 1999, to the following:

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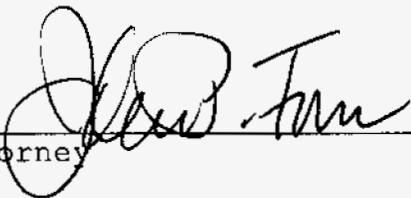
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