

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Petition of Competitive Carriers for Commission Action to support local competition in BellSouth Telecommunications, Inc.'s territory

§ Docket Nos. 981834-TP and 990321-TL
§ (Consolidated)

In re: Petition of Rhythms Links, Inc. for generic investigation to ensure that BellSouth Telecommunications, Inc., Sprint-Florida, Inc., and GTE Florida Inc., comply with obligation to provide alternative local exchange carriers with flexible, timely, and cost-efficient collocation

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§ Filed: January 7, 2000

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RECORDS AND REPORTING

**OBJECTIONS AND RESPONSES OF
COVAD COMMUNICATIONS COMPANY TO GTE FLORIDA INC.'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Pursuant to Rule 28-106.206 of the Florida Administrative Code, and Rule 1.340 of the Florida Rules of Civil Procedure, Covad Communications Company ("Covad") serves its objections and responses to GTE Florida Inc.'s First Request for Production of Documents ("First Request").

General Objections

1. Covad objects to these requests to the extent they seek to impose obligations other than those imposed by the Florida Administrative Code or the Florida Rules of Civil Procedures.

2. Covad objects to these requests to the extent they seek trade secrets and/or confidential proprietary information, or information that is protected from disclosure by privilege or immunity, including but not limited to, the attorney-client privilege and work product doctrine.

3. Covad objects to these requests to the extent they are oppressive or impose undue burden or expense on Covad, its employees, or agents.

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 - CTR _____
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 - MAS 3 _____
 - OFC _____
 - RRR _____
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 - WAW _____
 - OTH _____
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4. Covad objects to these requests to the extent they seek information from any entity other than Covad Communications Company, information that is publicly available, or information within the possession custody or control of GTE Florida, Inc.

5. Covad objects to providing a privilege log as defined by these requests. Covad agrees to comply with the Florida Rules of Civil Procedure, the Florida Administrative Code, and the Rules of the Florida Public Service Commission regarding claims of privilege.

6. Covad's investigation of this matter is continuing. Covad, therefore, reserves the right to supplement its responses and to assert additional objections to these requests, if necessary.

7. Covad incorporates each of these General Objections into its responses to individual interrogatories provided below.

Responses to Individual Requests for Production

REQUEST FOR PRODUCTION NO. 1: Please provide any and all documents supporting Covad's response to item 1 of GTEFL's First Set of Interrogatories to Covad Communications Company, filed on December 16, 1999.

RESPONSE: Covad objects to this request on the grounds that it seeks documents constituting trade secrets, and/or confidential or proprietary business information of Covad. Covad also objects to this request on the grounds that it seeks documents protected by the attorney-client communications privilege and/or the attorney work-product privilege. Covad further objects to this request on the grounds that it seeks documents within the possession, custody or control of GTE Florida Inc. Subject to and without waiver of the foregoing objections and its General Objections, Covad responds as follows:

Covad will produce responsive, non-privileged documents within its possession, custody or control.

Dated: January 7, 2000

Respectfully submitted,



for

Christopher V. Goodpastor, Esq.

Regional Counsel

Covad Communications Company

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QUALIFIED REPRESENTATIVE
OF COVAD COMMUNICATIONS
COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via facsimile/U.S. Mail this 7th day of January, 2000 to the following:

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