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May 24, 2000

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BY HAND DELIVERY

Ms. Blanca Bayó, Director
Division of Records and Reporting
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket 000601-TP

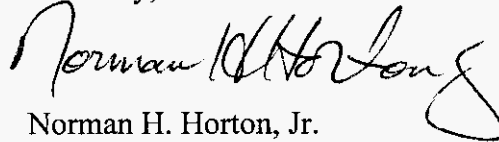
Dear Ms. Bayó:

Enclosed for filing on behalf of Southeastern Services, Inc. are an original and fifteen copies of Southeastern's Objection and Motion for Protective Order in the above referenced docket.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,



Norman H. Horton, Jr.

APP _____
CAF _____
CMP _____ NHH/amb
COM _____ Enclosure
CTR _____ cc: Mr. Mark Woods
ECR _____ Parties of Record
LEG _____
OPC _____
PAI _____
RGO _____
SEC _____
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

Request by Southeastern Services, Inc. for)
termination of rural LEC exemption of Northeast)
Florida Telephone Company, Inc., pursuant to)
47 U.S.C. 251 (f) (1) (B) of the)
Telecommunications Act of 1996)
_____)

Docket No. 000601-TP
Filed: May 24, 2000

OBJECTION AND MOTION FOR PROTECTIVE ORDER

COMES NOW, Southeastern Services, Inc. ("Southeastern") through its undersigned and files this Motion for Protective Order and as basis states:

1. On May 18, 2000 Southeastern notified the Commission that Southeastern had requested an Interconnection Agreement with Northeast Florida Telephone Company, Inc. ("Northeast"). With such notification, the Commission must determine that "such request is not unduly economically burdensome, is technically feasible and is consistent with Section 254 (other than subsection (b)(7) and (c)(1)(D) thereof)." Section 251(f)(1)(B).

2. On May 23, 2000, Northeast served Notices of Deposition indicating an intent to take the depositions of Mark Woods and Kenneth Kirkland, who are officers with Southeastern. Southeastern objects to the Notice and requests the entry of a Protective Order precluding the depositions or limiting the scope of discovery.

3. With the request of an agreement, the burden is now on Northeast to show that the request is unduly economically burdensome, not technically feasible or is not consistent with Section 254. It is not incumbent upon Southeastern to make that showing.

4. Southeastern requests an entry of a protective order that discovery not be had. Northeast carries the burden of proving that an interconnection agreement is inappropriate. Northeast's attempt, therefore, to depose the named individuals can only be for an improper purpose to annoy and be oppressive. Alternatively, if the Commission determines that deposing

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Southeastern's officials would lead to the discovery of relevant information, then Southeastern requests that the inquiry be limited solely the interconnection elements required from Northeast. Any other inquiry would be irrelevant to the request and beyond the scope of this docket.

5. Southeastern also objects to the request to bring copies of all work papers or other materials upon which the company is relying to satisfy the requirements of sections 251(c) and (f) of the Act. In the first place, sections 251(c) and (f) apply to incumbent local exchange companies, like Northeast, and not to Southeastern, so there are no responsive documents since Southeastern has no requirements to satisfy. Second, to the extent sections 251(c) and (f) have any application to Southeastern, the request is so broad as to be virtually impossible to respond. Third, Southeastern fears that Northeast's deposition is attempting to reach to market studies, business plans, and similar materials that are proprietary and confidential and of absolutely no relevance to the requirement on Northeast to demonstrate that the request is unduly economically burdensome or technically infeasible.

For the foregoing, Southeaster requests that an order be entered that discovery not be conducted as requested or that discovery be limited as suggested.

Respectfully submitted,


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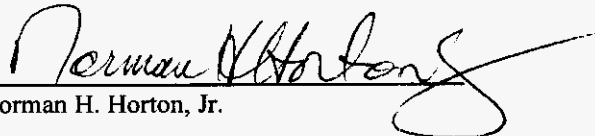
Attorneys for Southeastern Services, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing in Docket 000601-TP have been served upon the following parties by Hand Delivery (*), and/or U. S. Mail this 24th day of May, 2000.

Beth Keating, Esq.*
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J. Jeffry Wahlen
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