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Susan S. Masterton
Attorney

Law/External Affairs
Post Office Box 2214
1313 Blair Stone Road
Tallahassee, FL 32316-2214
Mailstop FLTLH00107
Voice 850 599 1560
Fax 850 878 0777
susan.masterton@mail.sprint.com

October 15, 2001

Ms. Blanca S. Bayó, Director
Division of the Commission Clerk
& Administrative Services
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0870

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OCT 15 PM 4:43
COMMISSION
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Re: Docket No. 010795-TP Sprint Communications Company Limited
Partnership's Notice of Objections to Verizon-Florida, Inc.'s
First Set of Interrogatories and First Request for Production of Documents

Dear Ms. Bayó:

Enclosed for filing is the original and five copies of Sprint Communications
Company Limited Partnership's ("Sprint"):

1. Notice of Objections to Verizon-Florida, Inc.'s ("Verizon") First Set of Interrogatories
and First Request for Production of Documents.

Copies of this have been served pursuant to the attached Certificate of Service.

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

Sincerely,

Susan S. Masterton

Enclosures

APP _____
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 COM _____
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 ECR _____
 LEG _____
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DOCUMENT NUMBER-DATE
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Sprint Communications) Docket No. 010795-TP
Company Limited Partnership for)
Arbitration with Verizon Florida, Inc. f/k/a)
GTE Florida, Incorporated, Pursuant to) Filed: October 15, 2001
Section 252(b) of the Telecommunications)
Act of 1996.)
_____)

**SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP'S
OBJECTIONS TO VERIZON FLORIDA, INC.'S FIRST SET OF
INTERROGATORIES AND FIRST REQUEST FOR
PRODCUTION OF DOCUMENTS**

Sprint Communications Company Limited Partnership ("Sprint") objects to Verizon Florida, Inc.'s ("Verizon's") First Set of Interrogatories and First Request for Production of Documents, dated October 4, 2001 and says:

GENERAL OBJECTIONS

1. Sprint objects to the interrogatories and request for production documents to the extent they seek to impose an obligation on Sprint to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such request is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.
2. Sprint objects to the interrogatories and request for production of documents to the extent they are intended to apply to matters other than the Florida intrastate operations subject to the jurisdiction of the Commission. Sprint objects to such interrogatories and

request for production of documents as being irrelevant, overly broad, unduly burdensome, and oppressive.

3. Sprint objects to each and every interrogatory, request for production of documents, and instruction to the extent that such interrogatory, request for production of documents, or instruction calls for information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. Sprint objects to each and every interrogatory and request for production of documents insofar as the interrogatory and request for production of documents are vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for purposes of such interrogatory and request for production of documents. Any answers provided by Sprint in response to these interrogatories and request for production of documents will be provided subject to, and without waiver of, the foregoing objection.

5. Sprint objects to each and every interrogatory and request for production of documents insofar as the interrogatory and request for production of documents are not reasonably calculated to lead to the discovery of admissible evidence and are not relevant to the subject matter of this action.

6. Sprint objects to providing information to the extent that such information is already in the public record before the Commission.

7. Sprint objects to each and every interrogatory and request for production of documents to the extent that the information requested constitutes “trade secrets” which are privileged pursuant to s. 90.506, Florida Statutes. Sprint also objects to each and every interrogatory and request for production of documents that would require the disclosure of customer specific information, the disclosure of which is prohibited by s. 364.24, Florida Statutes. To the extent that Verizon requests proprietary information that is not subject to the “trade secrets” privilege or to s. 364.24, Sprint will make such information available to Verizon at a mutually agreeable time and place upon the execution of a confidentiality agreement or subject to a Request for Confidential Classification.

8. Sprint objects to Verizon’s interrogatories and request for production of documents, instructions and definitions, insofar as they seek to impose obligations on Sprint that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

9. Sprint objects to Verizon interrogatories and request for production of documents insofar as any of them is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

10. Sprint is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, Sprint creates countless documents that are not subject to Commission or FCC retention of records requirements.

These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been identified in response to these interrogatories and request for production of documents. Sprint will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the interrogatories and request for production of documents purport to require more, Sprint objects on the grounds that compliance would impose an undue burden or expense.

SPECIFIC OBJECTIONS

VERIZON INTERROGATORY NO. 6:

6. Identify each state in which Sprint Communications Company Limited Partnership has entered into an interconnection agreement under Section 251 of the Telecommunications Act of 1996 with any Sprint ILEC affiliate. For each state, please state the names of the parties to the interconnection agreement(s) and the date(s) the agreement(s) became effective between the parties.

OBJECTION:

In addition to the General Objections set forth above, Sprint objects to this Interrogatory based upon the relevance of the information requested to the arbitration issues set forth in this proceeding. The terms and conditions in the interconnection agreements requested have no bearing on Verizon. Verizon has no right to MFN provisions contained in those agreements, as opposed to Sprint, which does have rights to MFN provision in Verizon agreement both under the Act and the Merger Conditions.

VERIZON INTERROGATORY NO. 11:

11. Please explain how calls from Verizon end users (1) dialing 1010333+0 or (2) presubscribed to Sprint long distance and dialing 00- are routed differently from the calls described in Interrogatory No. 10.

OBJECTION:

In addition to the General Objections set forth above, Sprint objects to this Interrogatory based upon the fact that this question is vague, confusing and subject to multiple interpretations. As such any answer provided to this question would be speculative based upon a given interpretation of the intent of the drafter.

VERIZON INTERROGATORY NO. 16:

16. Identify the circumstances in which the originating or terminating carrier is not the owner of the facilities over whose network the traffic originates or terminates.

OBJECTION:

In addition to the General Objections set forth above, Sprint objects to this Interrogatory based upon the fact that this question is vague, confusing and subject to multiple interpretations. As such any answer provided to this question would be unduly speculative based upon a given interpretation of the intent of the drafter.

VERIZON INTERROGATORY NO. 18:

18. How does Sprint expect to charge for its voice activated dialing service (e.g., flat fee, per minute, etc.), and what amounts does it expect to charge?

OBJECTION:

In addition to the General Objections set forth above, Sprint objects to this Interrogatory as calling for speculation because it seeks information about services not currently deployed by Sprint at this time. In addition, Sprint objects to this Interrogatory to the extent it seeks information regarding services Sprint “expects” to be deploying but has not deployed. Moreover, the Interrogatory seeks confidential business information that is neither relevant to the current interconnection agreement nor reasonably calculated to lead to the discovery of relevant information.

VERIZON INTERROGATORY NO. 19:

19. With respect to Sprint’s voice activated dialing service, does Sprint expect to charge differently for calls that return to the same local service area in which they originated versus calls that travel to a destination outside of the local calling area from which they originated?

OBJECTION:

In addition to the General Objections set forth above, Sprint objects to this Interrogatory based upon the fact that this question is vague, confusing and subject to multiple interpretations. As such any answer provided to this question would be speculative based upon a given interpretation of the intent of the drafter. In addition see objection to Interrogatory No. 18 above.

VERIZON INTERROGATORY NO. 20:

20. What are the costs associated with providing voice activated dialing? Please identify any market or other studies regarding or relating to what consumers will pay for use of the voice activated dialing service or any cost studies or models regarding the voice activated dialing service.

OBJECTION:

In addition to the General Objections set forth above, Sprint objects to this Interrogatory based upon the fact that this question is vague, confusing and subject to multiple interpretations. As such any answer provided to this question would be speculative based upon a given interpretation of the intent of the drafter. In addition see objection to Interrogatory No. 18 above.

VERIZON INTERROGATORY NO. 21:

21. What are Sprint's estimates or forecasts regarding the volume of traffic that will be generated using the voice activated dialing service that will terminate inside the originating caller's local calling area and that will terminate outside the originating caller's local calling area? Please identify any documents that include information responsive to this Interrogatory.

OBJECTION:

In addition to the General Objections set forth above, Sprint objects to this Interrogatory based upon the fact that this question is vague, confusing and subject to multiple interpretations. As such any answer provided to this question would be speculative based upon a given interpretation of the intent of the drafter. In addition see objection to Interrogatory No. 18 above.

VERIZON INTERROGATORY NO. 22:

22. How does Sprint propose to offer the vertical services it seeks from Verizon on a stand-alone basis at wholesale rates? Please list any and all products and services Sprint is planning to offer or may offer that require such stand-alone vertical services. Please identify any documents that include information responsive to this Interrogatory.

OBJECTION:

In addition to the General Objections set forth above, Sprint objects to this Interrogatory as calling for speculation because it seeks information about services not currently deployed by Sprint at this time. In addition, Sprint objects to this Interrogatory to the extent it seeks information regarding services Sprint is “planning” to offer but have not deployed. Moreover, the Interrogatory seeks confidential business information that is neither relevant to the current interconnection agreement nor reasonably calculated to lead to the discovery of relevant information.

VERIZON INTERROGATORY NO. 26:

26. If Sprint is permitted to commingle traffic as it requests in its Petition, will Sprint comply with the local use restrictions stated in the Supplemental Order Clarification, *In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, 15 FCC Rcd 9587 at ¶¶ 21-22 (2000)?

OBJECTION:

In addition to the General Objections set forth above, Sprint objects to this Interrogatory as calling for legal conclusions and also calling for speculation because it seeks information about services not currently deployed by Sprint at this time. Moreover, the Interrogatory seeks information that is neither relevant to the current interconnection agreement nor reasonably calculated to lead to the discovery of relevant information.

VERIZON INTERROGATORY NO. 39:

39. In Florida, generally describe the network assets of each entity identified in response to Interrogatory No. 38 (lines, switches, etc.)?

OBJECTION:

In addition to the General Objections set forth above, Sprint objects to this Interrogatory based upon the fact that this question is vague, confusing and subject to multiple interpretations. Moreover, the Interrogatory seeks information that is neither relevant to the current interconnection agreement nor reasonably calculated to lead to the discovery of relevant information.

VERIZON POD NO. 1:

1. Please produce copies of the interconnection agreements identified in response to Interrogatory No. 7.

OBJECTION:

See objection to Interrogatory No. 6. In addition Sprint states that producing all of these documents is burdensome and the documents are available as public documents at the various state commissions. In addition, Sprint states that the Request calls for legal interpretation of provisions in the agreements which is inappropriate.

VERIZON POD NO. 2:

2. Please produce all interconnection agreements identified in response to Interrogatory No. 8.

OBJECTION:

See objection to POD No. 1.

VERIZON POD NO. 4:

4. Please produce all market or other studies, cost studies or models, or other documents identified in response to Interrogatory No. 20.

OBJECTION:

See objection Interrogatory No. 20.

VERIZON POD NO. 5:

5. Please produce all documents identified in response to Interrogatory No. 21.

OBJECTION:

See objection to Interrogatory No. 21.

VERIZON POD NO. 6:

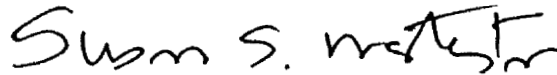
6. Please produce all documents identified in response to Interrogatory No. 22.

OBJECTION:

See objections to Interrogatory No. 22.

WHEREFORE, Sprint respectfully requests that the Commission sustain each of the objections set forth herein.

Respectfully submitted this 15th day of October 2001.



Susan S. Masterton
P.O. Box 2214
Tallahassee, FL 32316-2214
850-599-1560 (phone)
850-878-0777 (fax)
susan.masterton@mail.sprint.com

AND

Joseph P. Cowin
7301 College Blvd.
Overland Park, KS 66210
(913) 534-6165
(913) 534-6818 FAX
joseph.cowin@mail.sprint.com

ATTORNEYS FOR SPRINT

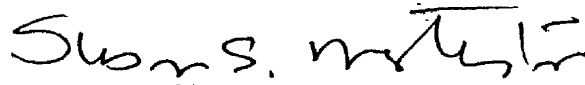
**CERTIFICATE OF SERVICE
DOCKET NO. 010795-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Hand Delivery*, and Overnight Mail**, this 15th day of October, 2001 to the following:

Verizon Florida, Inc.**
Kimberly Caswell
201 N. Franklin Street, FLTC0007
One Tampa City Center
Tampa, Florida 33602
Fax: 813-204-8870

Ms. Mary Anne Helton, Esq.*
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Kelly L. Faglioni, Esq.**
Meredith B. Miles, Esq.
Hunton & Williams
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, Virginia 23219-4074
Fax: 804-788-8218



Susan S. Masterton