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December 17, 2001

Ms. Blanca Bayo', Director  
Division of the Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

RECEIVED-FPSC  
01 DEC 17 PM 4:41  
COMMISSION  
CLERK

RE: Docket No. 010795-TP; Sprint Communications Company Limited Partnership's  
Objections to Verizon Florida, Inc.'s Second Set of Interrogatories and Second Request  
for Production of Documents

Dear Ms. Bayo':

Enclosed for filing are the original and 15 copies of Sprint Communications Company  
Limited Partnership's Objections to Verizon Florida, Inc.'s Second Set of Interrogatories  
and Second Request for Production of Documents. A copy is being served on the parties  
in this docket, pursuant to the attached Certificate of Service.

Please acknowledge receipt of this filing by stamping and initialing a copy of this letter  
and returning same to the courier. If you have any questions, please do not hesitate to  
call me at 850/599-1560.

Sincerely,

*Susan S. Masterton*  
Susan S. Masterton

Enclosures

- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
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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: December 17, 2001  
Section 252(b) of the Telecommunications )  
Act of 1996. )  
\_\_\_\_\_ )

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

Sprint Communications Company Limited Partnership ("Sprint") objects to Verizon Florida, Inc.'s ("Verizon's") Second Set of Interrogatories and Second Request for Production of Documents, dated December 7, 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

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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. 41**

- 41. With respect to the interconnection agreements produced in response to Request for Production Nos. 1 and 2, please identify all sections of each agreement, by section number, that relate to the issue of multi-jurisdictional trunks or trunk groups.**

#### **OBJECTION:**

In addition to the General Objections set forth above, Sprint objects to this request on the grounds that it seeks to require Sprint to perform a detailed analysis which Verizon is equally capable of performing. As such, this request is oppressive, unduly burdensome and overly time consuming. In addition, Sprint submits that the question calls for legal interpretations or conclusions regarding provisions in the agreements, which is inappropriate.

**VERIZON INTERROGATORY NO. 42**

42. Does Sprint the ILEC provide requesting CLECs the commingling configuration Sprint seeks from Verizon under Issue Nos. 6(a) and 6(b)? If so, how does Sprint charge for each portion of the configuration (*i.e.*, multiplexing, transport)?

**OBJECTION:**

In addition to the General Objections set forth above, Sprint objects to this request based upon the relevance of the requested information to the arbitration issues set forth in this proceeding. The terms and conditions of Sprint ILEC interconnection agreements 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 agreements both under the Act and the Merger Conditions.

**VERIZON INTERROGATORY NO. 43**

43. Does Sprint the ILEC provide OCn multiplexing to CLECs? If so, at what rates (*i.e.*, TELRIC, access, or other)?

**OBJECTION:**

In addition to the General Objections set forth above, Sprint objects to this request based upon the relevance of the requested information to the arbitration issues set forth in this proceeding. The terms and conditions of Sprint ILEC interconnection agreements 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 agreements both under the Act and the Merger Conditions.

**VERIZON INTERROGATORY NO. 56**

56. Referencing Diagram JRB -1, which is attached to the Direct Testimony of Sprint witness Burt, does Sprint currently serve any end users in the manner identified on that diagram as “End User Accessing Sprint via Special Access” in areas in Florida where Sprint intends to deploy its MAN Network? If so, in which areas? How many customers in each area?

**OBJECTION:**

In addition to the General Objections set forth above, Sprint objects to this Interrogatory to the extent that the information Verizon seeks is already in the possession of Verizon. To the extent Sprint is serving customers via Special Access, the Special Access is being provided by Verizon. Therefore, Verizon already has the information it is seeking from Sprint.

**VERIZON INTERROGATORY NO. 57**

57. Referencing Diagram JRB -1, which is attached to the Direct Testimony of Sprint witness Burt, does Sprint serve any end users in the manner identified in that diagram as “End User Accessing Sprint via UNE Loop” in areas in Florida where Sprint intends to deploy its MAN Network? If so, in which areas? How many customers in each area?

**OBJECTION:**

In addition to the General Objections set forth above, Sprint objects to this Interrogatory to the extent that the information Verizon seeks is already in Verizon’s possession. To the extent Sprint is serving customers using UNE loops, the UNE loops would be provided by Verizon. Therefore, Verizon already has the information it is seeking from Sprint.

**VERIZON INTERROGATORY NO. 58**

- 58. If you responded “yes” to Interrogatory Nos. 57 and 58 [should be 56 and 57?] for any one area in which Sprint intends to deploy its MAN network, for those areas, what is the approximate ratio of end users served by special access to end users served by UNE loops?**

**OBJECTION:**

In addition to the General Objections set forth above, Sprint objects to this Interrogatory because to the extent that Verizon already has the data in its possession as discussed above, it can determine the ratio it’s requesting in this Interrogatory. As such, this request is oppressive, unduly burdensome and overly time consuming.

**VERIZON POD NO. 11**

- 11. Please produce all documents that contain information responsive to Interrogatory Nos. 41 through 60.**

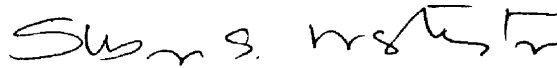
**OBJECTION:**

See Objections to Interrogatory Nos. 41, 42, 43, 56, 57 and 58.



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

Respectfully submitted this 17th day of December 2001.



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