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February 25, 2002

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. 990649B-TP

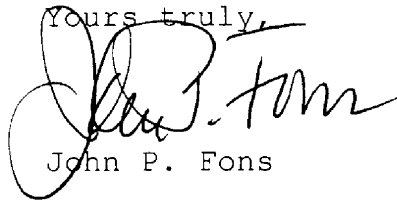
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Sprint's (General) Objections to Staff's Sixth Set of Interrogatories (Nos. 192-209).

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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DOCUMENT NUMBER-DATE
02180 FEB 25 2002
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into
Pricing of Unbundled Network
Elements

DOCKET NO. 990649B-TP
FILED: February 25, 2002

**SPRINT'S (GENERAL) OBJECTIONS TO STAFF'S
SIXTH SET OF INTERROGATORIES (NOS. 192-209)**

Sprint-Florida, Incorporated ("Sprint"), pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.340 and 1.280, Florida Rules of Civil Procedure, hereby files the following General Objections to the Staff of the Florida Public Service Commission's ("Staff's") Sixth Set of Interrogatories (Nos. 192-209) ("Interrogatories"), dated February 19, 2002.

The objections stated herein are preliminary in nature and are made at this time to comply with the 10-day requirement set forth in Order No. PSC-01-1904-PCO-TP, issued September 24, 2001, by the Florida Public Service Commission ("Commission"). Should additional grounds for objection be discovered as Sprint prepares its responses to the above-referenced interrogatories, Sprint reserves the right to supplement, revise, or modify its objections at the time it serves its responses.

1. Sprint objects to the interrogatories 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 interrogatories are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. Sprint objects to the interrogatories to the extent that are intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission. Sprint objects to such interrogatories as being irrelevant, overly broad, unduly burdensome, and oppressive.

3. Sprint objects to each and every interrogatory and related instructions to the extent that interrogatory 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 insofar as the interrogatories 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 these interrogatories. Any answers provided by Sprint in response to the interrogatories will be provided subject to, and without waiver of, the foregoing objection.

5. Sprint objects to each and every interrogatory insofar as it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of

this action. Sprint will attempt to note in its responses each instance where this objection applies.

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 Staff's discovery requests, 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.

8. Sprint objects to each and every interrogatory insofar as any of them are unduly burdensome, expensive, oppressive, or excessively time consuming as written.

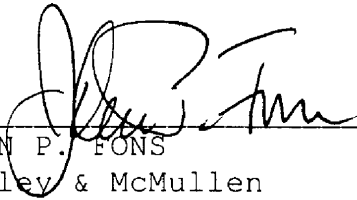
9. Sprint is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, Sprint creates countless documents that are not subject to Commission or FCC retention of records requirements. These documents are kept in numerous locations 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 requests. Sprint will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the interrogatories purport to

require more, Sprint objects on the grounds that compliance would impose an undue burden or expense.

Respectfully submitted this 25th day of February, 2002.

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and



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ATTORNEYS FOR SPRINT-FLORIDA, INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by e-mail transmission and hand delivery (*) or U. S. Mail this 25th day of February, 2002, to the following:

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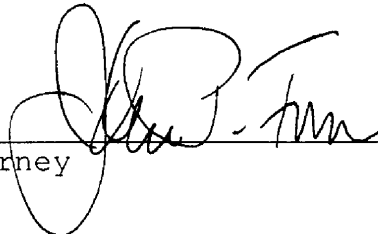
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