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June 10, 2002

Ms. Blanca S. Bayó, Director  
Division of the Commission Clerk  
And Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Docket No. 020099-TP Sprint-Florida, Incorporated's Objections to ALEC's First  
Request for Production of Documents and First Set of Interrogatories

Dear Ms. Bayó:

Enclosed for filing is the original and fifteen (15) copies of Sprint-Florida, Incorporated's  
Objections to ALEC's First Request for Production of Documents and First Set of  
Interrogatories in Docket No. 020099-TP.

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.

Thank you for your assistance in this matter.

Sincerely,

Susan S. Masterton

Enclosure

DOCUMENT NUMBER-DATE

06044 JUN 10 02

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Complaint of ALEC, Inc. for enforcement ) Docket No. 020099-TP  
of interconnection agreement )  
with Sprint-Florida, Incorporated )  
and request for relief. ) Dated: June 10, 2002  
\_\_\_\_\_ )

**SPRINT -FLORIDA, INCORPORATED'S**  
**OBJECTIONS TO ALEC, INC.'S FIRST REQUEST FOR PRODUCTION**  
**OF DOCUMENTS AND FIRST SET OF INTERROGATORIES**

Sprint-Florida, Incorporated ("Sprint"), pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.340, 1.350 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following Objections to ALEC, Inc.'s ("ALEC") First Request for Production of Documents and First Set of Interrogatories.

**INTRODUCTION**

The objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the ten-day requirement set forth in Order No. PSC- ("Procedural Order") issued by the Florida Public Service Commission ("Commission") in the above-referenced docket. Should additional grounds for objection be discovered as Sprint prepares its responses to the above-referenced requests, Sprint reserves the right to supplement, revise, or modify its objections at the time that it serves its responses on BellSouth. Moreover, should Sprint determine that a Protective Order is necessary with respect to any of the material requested by ALEC, Sprint reserves the right to file a motion with the Commission seeking such an order at the time that it serves its answers and responses on ALEC.

**GENERAL OBJECTIONS**

Sprint makes the following General Objections to ALEC's First Request for Production of Documents ("First POD") and First Set of Interrogatories ("First IRR"). These general

objections apply to each of the individual requests and interrogatories in the First POD and First IRR, respectively, and will be incorporated by reference into Sprint's responses and answers when they are served on ALEC.

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

2. Sprint has interpreted ALEC's requests to apply to Sprint's regulated intrastate operations in Florida and will limit its responses accordingly. To the extent that any request is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission, Sprint objects to such request to produce as irrelevant, overly broad, unduly burdensome, and oppressive.

3. Sprint objects to each and every request and instruction to the extent that such request 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 request insofar as the request is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these requests. Any responses provided by Sprint to ALEC's requests will be provided subject to, and without waiver of, the foregoing objection.

5. Sprint objects to each and every request insofar as the request 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 ALEC's discovery requests, instructions and definitions, insofar as they seek to impose obligation on Sprint that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

7. Sprint objects to providing information to the extent that such information is already in the public record before the Commission, or elsewhere.

8. Sprint objects to each and every request, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. Sprint objects to each and every request to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that ALEC's requests proprietary confidential business information which is not subject to the "trade secrets" privilege, Sprint will make such information available to counsel for ALEC pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

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 will be provided in response to these discovery requests. Rather, Sprint's responses will provide, subject to any applicable objections, all of the information obtained by Sprint after a reasonable and diligent search conducted in connection with these requests. Sprint shall conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the discovery requests purport to require more, Sprint objects on the grounds that compliance

would impose an undue burden or expense. To the extent that ALEC requests herein documents that have previously been produced to other parties in response to previous discovery, then without limiting any of the foregoing objections, Sprint incorporates herein by reference its objections to that previous discovery.

**SPECIFIC OBJECTIONS: FIRST IRR**

In addition to the foregoing general objections, Sprint raises the following specific objections to the following individual interrogatories in the First IRR:

**5. Identify and describe all Sprint invoices to all ALECs and Florida interexchange carriers for installation of DS3, DS1, and DS0s, and all Access Service Requests associated with these requests.**

Objection: In addition to its general objections, which are incorporated herein by reference, Sprint objects to this Interrogatory as unduly broad and overly burdensome. Answering this interrogatory would require an enormous effort on the part of Sprint to identify “all Sprint invoices to all ALECs and Florida interexchange carriers” since Sprint has relationships a great number ALECs and IXC in Florida and processes a multitude of ASRs for these carriers on a daily basis.

**6. Identify and describe all documents Sprint has sent to interconnecting ALECs regarding adoption of the FCC’s ISP Remand Order and any responsive documents those ALECs have sent to Sprint regarding payment of the 251(b)(5) traffic after adoption of the ISP Remand Order.**

Objection: In addition to its general objections, which are incorporated herein by reference, Sprint objects to this interrogatory because it calls for an answer that is beyond the scope of discovery in this case, i.e, not relevant and not calculated to lead to the discovery of admissible

evidence. ALEC, Inc. withdrew Count II of the original complaint which dealt with the application of the ISP Remand Order.

**7. Identify and describe any Sprint remittances and accompanying documents in which Sprint paid one or more ALEC rates tariffed by those ALECs or in which Sprint paid one or more ALEC for recurring or nonrecurring charges for more than one of the following charges for the same end to end transmission path: DSO charges, DS1 charges, DS3 charges.**

Objection: In addition to its general objections, which are incorporated herein by reference, Sprint objects to this Interrogatory as unduly broad and overly burdensome. Answering this interrogatory would require an enormous effort on the part of Sprint to identify “any Sprint remittances to ALECs since Sprint has relationships a great number ALECs and processes a multitude of invoices for these carriers on a daily basis.

**8. Identify and describe (including but not limited to quantity and/or length) the type and local of any telecommunications switch, multiplexer, digital cross connect system, or collocation arrangement that Sprint has deployed in Florida.**

Objection: In addition to its general objections, which are incorporated herein by reference, Sprint objects to this Interrogatory as unduly broad and overly burdensome. Sprint has deployed a multitude of the identified equipment throughout Florida for multiple purposes and identifying all such equipment would place an enormous burden on Sprint. In addition, the breadth of this request is beyond the scope of discovery in this case, i.e., not relevant and not calculated to lead to the discovery of admissible evidence. In addition, Sprint objects in that the information requested is highly proprietary Sprint confidential information.

**9. Identify and describe (including but not limited to quantity and/or length) the type and location of any interoffice facility, loop, and/or trunks that Sprint has deployed in Florida.**

Objection: In addition to its general objections, which are incorporated herein by reference, Sprint objects to this Interrogatory as unduly broad and overly burdensome. Sprint has deployed a multitude of the identified facilities throughout Florida for multiple purposes and identifying all such facilities would place an enormous burden on Sprint. In addition, the breadth of this request is beyond the scope of discovery in this case, i.e., not relevant and not calculated to lead to the discovery of admissible evidence. In addition, Sprint objects in that the information requested is highly proprietary Sprint confidential information.

**10. For each of the past two years, and as a percent of all Sprint' revenues each year, identify and describe the percentage of total Sprint revenues Sprint received from reciprocal compensation payments from other telecommunications carriers, the name of each telecommunications carrier remitting such payments, and the percentage of revenues received from each of these telecommunications carriers.**

Objection: In addition to its general objections, which are incorporated herein by reference, Sprint objects to this Interrogatory as unduly broad and overly burdensome. In addition, the breadth of this request is beyond the scope of discovery in this case, i.e., not relevant and not calculated to lead to the discovery of admissible evidence. In addition, Sprint objects in that the information requested is highly proprietary Sprint confidential information.

**11. Identify and describe all telecommunications carriers, other than ALEC, which have disputed the accuracy of a Sprint' remittance for telecommunications services provided to Sprint in the past five years.**

Objection: In addition to its general objections, which are incorporated herein by reference, Sprint objects to this Interrogatory as unduly broad and overly burdensome. In addition, the breadth of this request is beyond the scope of discovery in this case, i.e., not relevant and not calculated to lead to the discovery of admissible evidence. In addition, Sprint objects in that the information requested is highly proprietary Sprint confidential information.



**SPECIFIC OBJECTIONS; FIST POD**

**6. Produce all documents discussing the current dispute between ALEC and Sprint relating to billing and payments for transport facilities.**

Objection: Sprint objections to this POD because the information requested is exempt from discovery pursuant to Florida Rule of Civil Procedure 12.

**9. Produce all Sprint invoices to all ALECs and competitive interexchange carriers within the State of Florida for installation of DS3, DS1 and DS0s and all ASRs associated with these requests.**

Objection: See objection to Interrogatory No.7.

**10. Produce all documents Sprint has sent to interconnecting ALECs regarding adoption of the FCC's ISP Remand Order and any responsive documents those ALECs have sent to Sprint relating to payment of the 251(b)(5) traffic after adoption of the ISP Remand Order.**

Objection: See objection to Interrogatory No. 6.

**11. Produce all invoices produced by Sprint as an incumbent or alternative local exchange carrier in Florida or in any other state(s) for charges Sprint assessed upon a local exchange carrier for transport of traffic that crosses LATA boundaries and all documents explaining such billing.**

Objection: In addition to its general objections, which are incorporated herein by reference, Sprint objects to this POD as unduly broad and overly burdensome. Answering this POD would require an enormous effort on the part of Sprint to identify "all Sprint invoices produced by Sprint in Florida or any other state(s)" since Sprint has relationships a great number ALECs and IXCs in Florida and processes a multitude of ASRs for these carriers on a daily basis.

**13. Produce all invoices generated by Sprint as an incumbent or alternate local exchange carrier in Florida or in any other state(s) in which Sprint billed a local exchange carrier for either recurring or nonrecurring transport charges for transport between the same two end points for more than one of the following service levels: DS0, DS1, DS3.**

OBJECTION: In addition to its general objections, which are incorporated herein by reference, Sprint objects to this POD as unduly broad and overly burdensome. Answering this POD would require an enormous effort on the part of Sprint to identify “all Sprint invoices produced by Sprint in Florida or any other state(s)” since Sprint has relationships a great number ALECs and IXC’s in Florida and processes a multitude of ASRs for these carriers on a daily basis.

DATED this 10<sup>th</sup> day of June, 2002.



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ATTORNEY FOR SPRINT

**CERTIFICATE OF SERVICE  
DOCKET NO. 020099-TP**

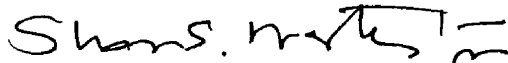
I HEREBY CERTIFY that a true and correct copy of the foregoing was served by hand delivery\* or U.S. Mail this 10th day of June, 2002 to the following:

Volaris Telecom, Inc.  
Ms. Judy B. Tinsley  
c/o DURO Communications, Inc.  
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