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Mrs. Blanca S. Bayó  
Director, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Docket Nos. 981834-TP and 990321-TP (Generic Collocation)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of Verizon Florida Inc.'s General Objections to Staff's Third Set of Interrogatories and Third Request for Production of Documents, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

  
Catherine Kane Ronis

cc: All Parties of Record  
Charles Schubart

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**CERTIFICATE OF SERVICE**  
**Docket No. 981834-TP and 990321 TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail this 20th day of March, 2003 (with service via First Class U.S. Mail or Facsimile to follow) to the following:

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Catherine Kane Ronis

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of Competitive )  
Carriers for Commission Action ) Docket No. 981834-TP  
To Support Local Competition )  
In Verizon FL's Service Territory )

In re: Petition of ACI Corp. d/b/a )  
Accelerated Connections, Inc. for ) Docket No. 990321-TP  
Generic Investigation into Terms and )  
Conditions of Physical Collocation )

\_\_\_\_\_ ) Filed: March 10, 2003

**VERIZON FLORIDA INC.'S GENERAL OBJECTIONS TO  
STAFF'S THIRD SET OF INTERROGATORIES AND  
THIRD REQUEST FOR PRODUCTION OF DOCUMENTS**

Verizon Florida Inc. ("Verizon FL"), pursuant to Rule 28-106.206 of the Florida Administrative Code and Rules 1.340 and 1.280 of the Florida Rules of Civil Procedure, hereby files the following General Objections to Staff's Third Set of Interrogatories and Third Request for Production of Documents, both dated March 10, 2003.

The objections stated herein are preliminary in nature and are made at this time to comply with the requirement set forth in Order No. PSC-02-1513-PCO-TP, issued on November 4, 2002 by the Florida Public Service Commission ("Commission"). Should additional grounds for objection be discovered as Verizon FL prepares its answers to the above-referenced Interrogatories and Requests, Verizon FL reserves the right to supplement, revise, or modify its objections at the time it serves its responses.

## GENERAL OBJECTIONS

1. Verizon FL objects to each Production Request and Interrogatory to the extent that it seeks to impose an obligation on Verizon FL to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such Interrogatory or Request is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. Verizon FL objects to each Production Request and Interrogatory to the extent that it is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission. Verizon FL objects to each such Interrogatory and Request as being irrelevant, overly broad, unduly burdensome, and oppressive.

3. Verizon FL objects to each Production Request and Interrogatory to the extent that it requests information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. Verizon FL objects to each Production Request and Interrogatory to the extent that it is vague, ambiguous, overly broad, imprecise, or to the extent that it utilizes terms that are subject to multiple interpretations and are not properly defined or explained for purposes of this discovery. Any answers provided by Verizon FL in response to these Interrogatories and Production Requests will be provided subject to, and without waiver of, the foregoing objection.

5. Verizon FL objects to each Production Request and Interrogatory to the extent that it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. Verizon FL will attempt to note in its responses each instance where this objection applies.

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

7. Verizon FL objects to each Production Request and Interrogatory to the extent that it seeks to impose obligations on Verizon FL that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

8. Verizon FL objects to each Production Request and Interrogatory to the extent that responding to it would be unduly burdensome, expensive, oppressive, or excessively time consuming.

9. Verizon FL objects to each Production Request and Interrogatory to the extent that it is not limited to any stated period of time and, therefore, is overly broad and unduly burdensome.



10. Verizon is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, Verizon 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. Verizon FL will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the Production Requests or Interrogatories purport to require more, Verizon FL objects on the grounds that compliance would impose an undue burden or expense.

Respectfully submitted,



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Dated: March 20, 2003

Attorneys for Verizon Florida Inc.