

ORIGINAL

WILMER, CUTLER & PICKERING

2445 M STREET, N.W.

WASHINGTON, DC 20037-1420

TELEPHONE (202) 663-6000

FACSIMILE (202) 663-6363

WWW.WILMER.COM

March 31, 2003

RECEIVED-FPSC  
03 APR -4 AM 9:18  
COMMISSION  
CLERK

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 Fourth Set of Interrogatories and Fourth 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,

*Daniel McCuaig*  
Daniel McCuaig

cc: All Parties of Record  
Charles Schubart

RECEIVED & FILED

*Th*

FPSC-BUREAU OF RECORDS

AUS \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM 5 \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL \_\_\_\_\_  
OPC \_\_\_\_\_  
MMS \_\_\_\_\_  
SEC 1 \_\_\_\_\_  
OTH \_\_\_\_\_

03 APR -4 AM 8:10

DOCUMENT NUMBER-DATE  
DISTRIBUTION CENTER

03164 APR-4 03

FPSC-COMMISSION CLERK

**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 31st day of March, 2003 (with service via First Class U.S. Mail or Facsimile to follow) to the following:

Beth Keating, Staff Counsel  
C. Lee Fordham, Staff Counsel  
Wayne Knight, Staff Counsel  
Adam Teitzman, Staff Counsel  
Andrew Maurey  
Betty Gardner  
Cheryl Bulecza-Banks  
David Dowds  
Jackie Schindler  
Jason-Earl Brown  
Laura King; Bob Casey  
Pat Lee; Stephanie Cater  
Paul Vickery  
Pete Lester; Zoryana Ring  
Sally Simmons  
Shevie Brown  
Todd Brown  
Victor Mckay  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6212  
Fax. No. (850) 413-6250  
bkeating@psc.state.fl.us  
cfordham@psc.state.fl.us  
wknight@psc.state.fl.us  
ateitzma@psc.state.fl.us  
amaurey@psc.state.fl.us  
bgardner@psc.state.fl.us  
cbulecza@psc.state.fl.us  
david.dowds@psc.state.fl.us  
jschindl@psc.state.fl.us  
jebrown@psc.state.fl.us  
lking@psc.state.fl.us; bcasey@psc.state.fl.us  
plee@psc.state.fl.us; scater@psc.state.fl.us  
pvickery@psc.state.fl.us  
plester@psc.state.fl.us; zring@psc.state.fl.us  
sasimmon@psc.state.fl.us  
sbbrown@psc.state.fl.us  
tbrown@psc.state.fl.us  
vmckay@psc.state.fl.us

Terry Monroe  
Vice President, State Affairs  
Competitive Telecomm. Assoc.  
1900 M Street, N.W.  
Suite 800  
Washington, D.C. 20036  
Tel. No. (202) 296-6650  
Fax. No. (202) 296-7585  
tmonroe@comptel.org

Marilyn H. Ash  
MGC Communications, Inc.  
3301 North Buffalo Drive  
Las Vegas, Nevada 89129  
Tel. No. (702) 310-8461  
Fax. No. (702) 310-5689  
mash@mgccom.com

Patrick Wiggins  
Charles J. Pellegrini  
Katz, Kutter Law Firm  
106 E. College Avenue  
12th Floor  
Tallahassee, FL 32301  
Tel. No. (850) 224-9634  
Fax. No. (850) 222-0103  
Attys. for Intermedia  
pkwiggins@katzlaw.com

J. Phillip Carver  
Senior Attorney  
Nancy Sims  
Nancy White  
Stan Greer  
BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
Tel. No. (404) 335-0710  
J.Carver@bellsouth.com  
nancy.sims@bellsouth.com  
nancy.white@bellsouth.com  
stan.greer@bellsouth.com

Peter M. Dunbar, Esq.  
Barbara D. Auger, Esq.  
Pennington, Moore, Wilkinson &  
Dunbar, P.A.  
Post Office Box 10095  
Tallahassee, Florida 32302  
Tel. No. (850) 222-3533  
Fax. No. (850) 222-2126  
pete@penningtonlawfirm.com  
Barbara@penningtonlawfirm.com

Carolyn Marek  
Vice President of Regulatory Affairs  
Southeast Region  
Time Warner Communications  
233 Bramerton Court  
Franklin, Tennessee 37069  
Tel. No. (615) 376-6404  
Fax. No. (615) 376-6405  
Represented by Pennington Law Firm  
Carolyn.Marek@twtelecom.com

Mark Buechele  
Jonathan Audu  
Paul Turner  
Supra Telecommunications  
& Information Systems, Inc.  
2620 S.W. 27th Avenue  
Miami, FL 33133  
Tel. No. (305) 531-5286  
Fax. No. (305) 476-4282  
buechele@stis.net  
jonathan.audu@stis.com  
pturner@stis.com

Donna Canzano McNulty, Esq.  
MCI WorldCom  
1203 Governors Square Boulevard  
Suite 201  
Tallahassee, FL 32301  
Tel. No. (850) 219-1008  
Fax. No. (850) 219-1018  
donna.mcnulty@wcom.com

Michael A. Gross  
VP Reg. Affairs & Reg. Counsel  
Florida Cable Telecomm. Assoc.  
246 East 6th Avenue, Suite 100  
Tallahassee, FL 32303  
Tel. No. (850) 681-1990  
Fax. No. (850) 681-9676  
mgross@fcta.com

TCG South Florida  
c/o Rutledge Law Firm  
Kenneth Hoffman  
P.O. Box 551  
Tallahassee, FL 32302-0551  
Tel. No. (850) 681-6788  
Fax. No. (850) 681-6515  
ken@reuphlaw.com

Time Warner AxS of FL, L.P.  
2301 Lucien Way  
Suite 300  
Maitland, FL 32751  
Represented by Pennington Law Firm  
Pennington Law Firm served by e-mail

Laura L. Gallagher  
Laura L. Gallagher, P.A.  
101 E. College Avenue  
Suite 302  
Tallahassee, FL 32301  
Tel. No. (850) 224-2211  
Fax. No. (850) 561-3611  
Represents MediaOne  
gallagherl@gtlaw.com

Susan S. Masterton  
Charles J. Rehwinkel  
Sprint Comm. Co. LLP  
P.O. Box 2214  
MC: FLTLHO0107  
Tallahassee, FL 32316-2214  
Tel. No. (850) 847-0244  
Fax. No. (850) 878-0777  
susan.masterton@mail.sprint.com

Sprint-Florida, Incorporated  
Mr. F. B. (Ben) Poag  
P.O. Box 2214 (MC FLTLHO0107)  
Tallahassee, FL 32316-2214  
Tel: 850-599-1027  
Fax: 407-814-5700  
Ben.Poag@mail.sprint.com

William H. Weber, Senior Counsel  
Gene Watkins  
Covad Communications  
1230 Peachtree Street, N.E.  
19th Floor  
Atlanta, Georgia 30309  
Tel. No. (404) 942-3494  
Fax. No. (404) 942-3495  
wweber@covad.com  
gwatkins@covad.com

Bettye Willis  
ALLTEL Comm. Svcs. Inc.  
One Allied Drive  
Little Rock, AR 72203-2177  
bettye.j.willis@alltel.com

J. Jeffrey Wahlen  
Ausley & McMullen  
P.O. Box 391  
Tallahassee, FL 32302  
jwahlen@ausley.com

Rodney L. Joyce  
Shook, Hardy & Bacon, L.L.P.  
600 14th Street, N.W.  
Suite 800  
Washington, DC 20005-2004  
Tel. No. (202) 639-5602  
Fax. No. (202) 783-4211  
Counsel for Network Access Solutions  
rjoyce@shb.com

Brent McMahan, Vice President  
Regulatory and Governmental Affairs  
Network Telephone Corporation  
815 South Palafox Street  
Pensacola, FL 32501  
Tel. No. (850) 432-4855  
Fax. No. (850) 437-0724  
Brent.McMahan@networktelephone.net

Network Access Solutions Corp.  
Mr. Don Sussman  
Three Dulles Tech Center  
13650 Dulles Technology Drive  
Herndon, VA 20171-4602  
Tel. No.: (703) 793-5102  
Fax. No. (208) 445-7278  
dsussman@nas-corp.com

Ms. Nanette S. Edwards  
4092 South Memorial Parkway  
Huntsville, AL 35802-4343  
Tel. No. (256) 382-3856  
Fax. No. (256) 382-3936  
nedwards@itcdeltacom.com

Ms. Lisa A. Riley  
Michael Henry  
Roger Fredrickson  
1200 Peachtree Street, N.E.  
Suite 8066  
Atlanta, GA 30309-3523  
Tel. No. (404) 810-7812  
Fax. No. (404) 877-7646  
lriley@att.com  
michaeljhenry@att.com  
rfredrickson@att.com

Florida Digital Network, Inc.  
Matthew Feil, Esq.  
390 North Orange Avenue  
Suite 2000  
Orlando, FL 32801  
Tel. No. (407) 835-0460  
Fax. No. (407) 835-0309  
mfeil@floridadigital.net

FPTA, Inc.  
Mr. David Tobin  
Tobin & Reyes  
7251 West Palmetto Park Road  
#205  
Boca Raton, FL 33433-3487  
Tel. No. (561) 620-0656  
Fax. No. (561) 620-0657  
dst@tobinreyes.com

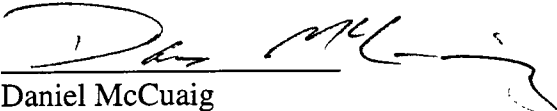
John McLaughlin  
KMC Telecom. Inc.  
Mr. John D. McLaughlin, Jr.  
1755 North Brown Road  
Lawrenceville, GA 30043  
Tel. No. (678) 985-6261  
Fax. No. (678) 985-6213  
jmclau@kmctelecom.com

Joseph A. McGlothlin  
Vicki Gordon Kaufman  
Tim Perry  
McWhirter, Reeves, McGlothlin,  
Davidson, Decker, Kaufman, Arnold,  
& Steen, P.A.  
117 South Gadsden Street  
Tallahassee, FL 32301  
Tel. No. (850) 222-2525  
Fax. No. (850) 222-5606  
Attys. for FCCA  
Atty. for Network Telephone Corp.  
Atty. for BlueStar  
mcglathlin@mac-law.com  
vkaufman@mac-law.com  
tperry@mac-law.com

Andrew Isar  
Telecomm. Resellers Assoc.  
7901 Skansie Avenue  
Suite 240  
Gig Harbor, WA 98335  
Tel. No. (253) 851-6700  
Fax. No. (253) 851-6474  
aisar@millerisar.com

Tracy W. Hatch, Esq.  
Floyd R. Self, Esq.  
Messer, Caparello & Self, P.A.  
Post Office Box 1876  
Tallahassee, FL 32302-1876  
Tel. No. (850) 222-0720  
Fax. No. (850) 224-4359  
Represents AT&T  
Represents ITC^DeltaCom  
fself@lawfla.com  
thatch@lawfla.com

Richard D. Melson  
Hopping Green Sams & Smith, P.A.  
Post Office 6526  
123 South Calhoun Street  
Tallahassee, FL 32314  
Tel. No. (850) 222-7500  
Fax. No. (850) 224-8551  
Atty. For MCI & ACI  
rmelson@hgslaw.com

  
Daniel McCuaig

**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 31, 2003

**VERIZON FLORIDA INC.'S INITIAL OBJECTIONS TO  
STAFF'S FOURTH SET OF INTERROGATORIES AND  
FOURTH 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 Initial Objections to Staff's Fourth Set of Interrogatories and Fourth Request for Production of Documents, both dated March 21, 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.



## **INITIAL SPECIFIC OBJECTIONS: FOURTH POD**

In addition to the foregoing general objections, Verizon FL raises the following initial specific objections to the following individual requests in Staff's Fourth Request for Production of Documents:

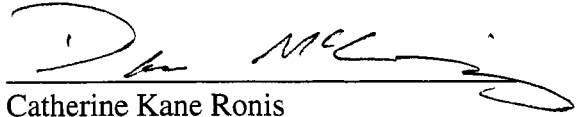
**40. Provide electronic copies of the architectural drawings for all Verizon COs in the state of Florida where collocation has occurred. To the extent possible provide these files on compact disc(s) as AutoCAD drawing files. (e.g. CLLIcode.dwg or Coname.dwg)**

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this document request on the grounds that the documents requested are proprietary and highly confidential, and that the format requested is the most likely of all to comprise critical infrastructure security. Notwithstanding these objections, Verizon FL will determine what, if any, responsive documents it may be willing to provide in hard copy format for Staff review.

**45. Provide all documents used to support or derive any Subject Matter Expert estimates used in Verizon's collocation study.**

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this document request on the grounds that it is unduly burdensome and overly broad. Verizon FL has provided documents associated with SME estimates in response to specific requests contained in Staff's document requests 3, 8, 12 and 16, and will continue to produce specifically requested documents (unless the request is for some other reason objectionable).

Respectfully submitted,

A handwritten signature in black ink, appearing to read "D. McCuaig", is written over a horizontal line.

Catherine Kane Ronis  
Daniel McCuaig  
Wilmer, Cutler & Pickering  
2445 M Street, NW  
Washington, DC 20037-1420  
(202) 663-6000

Dated: March 31, 2003

Attorneys for Verizon Florida Inc.