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Reply to: P.O. Box 1876
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April 4, 2003

BY HAND DELIVERY

Ms. Blanca Bayó, Director
Division of Records and Reporting
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket Nos. 981834-TP and 990321-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of ITC^DeltaCom Communications, Inc. are an original and fifteen copies of ITC^DeltaCom Communications, Inc.'s Preliminary Objections to Staff's First Request for Production of Documents in the above referenced docket.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely yours,

Norman H. Horton, Esq.

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NHH/amb
Enclosure

cc: Nanette Edwards, Esq.
Parties of Record

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers)
for Commission action to support local)
competition in BellSouth)
Telecommunications, Inc.'s service)
territory)

Docket No. 981834-TP

In re: Petition of ACI Corp. d/b/a)
Accelerated Connections, Inc. for generic)
investigation to ensure that BellSouth)
Telecommunications, Inc., Sprint-Florida,)
Incorporated, and GTE Florida Incorporated)
comply with obligation to provide alternative)
local exchange carriers with flexible, timely,)
and cost-efficient physical collocation.)

Docket No. 990321-TP
Filed: April 4, 2003

**ITC^DELTACOM COMMUNICATIONS, INC.'S PRELIMINARY
OBJECTIONS TO STAFF'S FIRST REQUEST
FOR PRODUCTION OF DOCUMENTS**

ITC^DELTACOM COMMUNICATIONS, INC., d/b/a ITC^DELTACOM ("ITC^DeltaCom"), 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 Objections to Staff's First Request for Production of Documents, dated March 25, 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 ITC^DeltaCom prepares its response to the Request, ITC^DeltaCom reserves the right to supplement, revise, or modify its objections at the time it serves its response.

1. ITC^DeltaCom objects to the Production Request and to the extent that it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the issues or the subject matter of this proceeding.

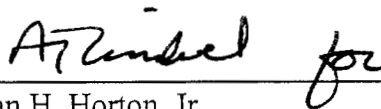
2. ITC^DeltaCom objects to the Production Request to the extent that it seeks to impose obligations that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

3. ITC^DeltaCom objects to the Production Request to the extent that responding to it would be unduly burdensome, expensive, oppressive, or excessively time consuming.

4. ITC^DeltaCom objects to the Production Request to the extent that it is not limited to any stated period of time, and therefore, is overly broad and unduly burdensome.

5. ITC^DeltaCom objects to the Production Request to the extent that it requires the production of proprietary, confidential information not subject to disclosure.

Respectfully submitted this 4th day of April, 2003.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by Hand Delivery (*) and/or U. S. Mail this 4th day of April, 2003.

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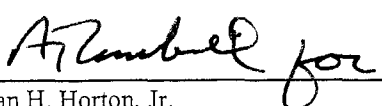
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