

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition of Sprint-Florida, Incorporated,)
To reduce intrastate switched network)
Access rates to interstate parity in)
Revenue neutral manner pursuant to)
Section 364.164(1), Florida Statutes)

Docket no. 030868-TL

Filed September 3, 2003

**CITIZENS' FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO
SPRINT-FLORIDA, INC**

Pursuant to § 350.0611(1), Fla. Stat. (2002), Fla. Admin. Code R. 28-106.206, and Fla. R. Civ. P.1.350, Florida's Citizens ("Citizens") request Sprint-Florida, Incorporated (Sprint-Florida) to produce the following documents for inspection and copying at the Office of Public Counsel, Claude Pepper Building, 111 West Madison Street, Room 812, Tallahassee, Florida 32399-1400, on or before Thursday, September 18, 2003, or at such other time and place as may be mutually agreed upon by counsel.

DEFINITIONS

1. The terms "document" or "documents" are meant to have the broadest possible meaning under applicable law and includes, but is not necessarily limited to, any written, recorded, filmed or graphic matter, whether produced, reproduced, or on paper, e-mail, cards, tapes, film, electronic facsimile, computer storage device or any other media, including, but not limited to, memoranda, notes, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial

statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, and notes, any of which are in your possession, custody, or control.

2. The term "referring or relating to" means any oral, graphic, demonstrative, telephonic, verbal, electronic (including e-mail), written or other conveyance of information, including but not limited to conversations, telecommunications, and documents.

3. The terms "Sprint-Florida" and "company" encompass Sprint-Florida, together with the officers, employees, consultants, agents, representatives, attorneys, and any other person or entity acting on behalf of Sprint-Florida.

4. As used herein the terms "you," "your," and "company" refer to Sprint-Florida, as defined in the previous paragraph, together with the officers, employees, consultants, agents, representatives, and attorneys of Sprint-Florida, as well as any other person or entity acting on behalf of Sprint-Florida.

5. Words in the past tense include the present, and words in the present tense include the past. Use of the singular includes the plural, and use of the masculine includes the feminine where appropriate, and vice versa.

INSTRUCTIONS

1. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which privilege is claimed, together with the following information: date, sender, recipients, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

2. These discovery requests are to be answered with reference to all information in your possession, custody or control, or reasonably available to you.

3. If Sprint-Florida has possession, custody, or control of the originals of the documents requested, please produce the originals or a complete copy of the originals and all copies which are different in any way from the original, whether by interlineation, receipt stamp or notation. If Sprint-Florida does not have possession, custody, or control of the originals of the documents requested, please produce any copies in the possession, custody, or control, however made, of Sprint-Florida.

4. Please construe "and" as well as "or" either disjunctively or conjunctively as necessary to bring within the scope of this production of documents any document which might otherwise be construed to be outside the scope.

5. Unless otherwise indicated, please only produce documents created since January 1, 2000.

DOCUMENTS REQUESTED

1. Please provide all documents in your possession, custody or control discussing or evaluating the impact of rate rebalancing in general, or the rate rebalancing petition you filed in this proceeding, on customers' bills.

2. Please provide all documents in your possession, custody or control discussing or showing the mean, median, or other distribution of customer intrastate long distance calling in Florida.

3. Please provide all documents in your possession, custody or control discussing or evaluating the typical, average, or median bill of customers for local telecommunications services, including ancillary services.

4. Please provide all documents in your possession, custody or control discussing or evaluating the possible effect of your proposal in this case on subscribership.

5. Please provide all documents in your possession, custody or control discussing or evaluating the number or percent of your customers making ECS calls in any given month or other time period.

6. Please provide all documents in your possession, custody or control discussing or evaluating criteria or business cases for entering new markets in Florida for local telecommunications services.

7. Please provide all documents in your possession, custody or control discussing or evaluating the substitution of wireline service by wireless service.

8. Provide Sprint PCS's intrastate access rates and associated terms and conditions for each wireless carrier and interexchange carrier with which SprintPCS interconnects in the state of Florida.

9. Provide all documents describing, characterizing, calculating or analyzing the amount of current support for basic local telecommunications services that prevents the creation of a more attractive competitive local exchange market for the benefit of residential customers used by the company in preparation for this docket.

10. Provide all documents describing, characterizing, calculating, evaluating or analyzing the amount of increases in basic residential rates required to induce enhanced market entry used by the company in preparation for this docket.

11. Provide all studies or other documents dealing with the inducement of market entry used by the company in its preparation for this docket.

12. Provide all studies or other documents concerning the company's choices for products and services that would be increased in order to obtain revenue neutral recovery of the access line reductions requested in this docket.

13. Provide all cost studies completed since January 1, 1998 or other documents the company used to evaluate and quantify the existing cost of intrastate switched network access.

14. Referring to the testimony of witness Felz, page 6, line 21, provide all cost studies or other documents presented by Sprint (formerly United and Centel) to the Florida PSC in Docket # 820537 to substantiate access charge costs.

15. Referring to the testimony of witness Felz, page 7, please provide copies of all Sprint (formerly United and Centel) cost studies of access costs submitted by the company in FPSC Docket No. 8609874-TL, Docket No. 891239-TL and Docket No. 910980-TL.

16. Referring to the testimony of witness Dickerson, please provide copies of all regulatory decisions received by Sprint in its operating territory since January 1, 2001 where regulatory agencies did not agree with the recommendations of witness Dickerson regarding Sprint's proposed rates developed through the same cost study programs that witness Dickerson relies upon in this docket.

17. Provide all studies made by Sprint since January 1, 1998 that calculate the costs of basic residential service in Florida or any other Sprint territory based on an assumption that the loop costs are common costs shared by all services, including vertical services and interstate and intrastate access services.

18. Provide the results of all Sprint cost studies developed in Florida or other Sprint territories for bundled services since January 1, 2000, where the basic residential local exchange service component was bundled with additional products and services and provided at a single reduced rate.

19. Please provide copies of all documents in the company's possession relating to the number or percentage of customers who do not make a long distance call during a given month.

20. Please provide copies of all documents in the company's possession relating to the impact of the rates proposed in this docket on residential customers.

21. Provide copies of any Sprint documents completed since January 1, 1990 regarding the elasticity of demand for residential service.

22. Provide all documents that identify, by month, the number of residential customers in Florida who have been temporarily denied due to non-payment for year 2000, 2001 and 2002.

23. Provide all documents that identify, by month, the number of residential customers in Florida who have been disconnected for non-payment for year 2000, 2001 and 2002.

24. Provide a copy of the company's two most recent price cap filings with the Commission which shows services, rates, volumes (to the extent any or all of this is included in the filing) and other information by basket.

Respectfully Submitted

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DOCKET NO. 030868-TL

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S.

Mail or hand-delivery to the following parties on this 3rd day of September, 2003.



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