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September 5, 2003

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Mrs. Blanca S. Bayó  
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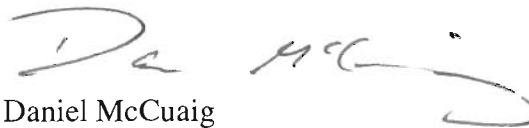
**Re: Docket Nos. 981834-TP and 990321-TP (Generic Collocation)**

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of Verizon Florida Inc.'s Initial Objections to AT&T's Third Set of Interrogatories, 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

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 5th day of September, 2003 (with service via First Class U.S. Mail or Facsimile to follow) to the following:

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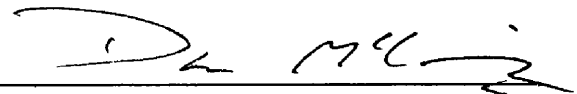
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Daniel McCuaig



### **GENERAL OBJECTIONS**

1. Verizon FL objects to each 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 is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. Verizon FL objects to each 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 as being irrelevant, overly broad, unduly burdensome, and oppressive.

3. Verizon FL objects to each 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 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 will be provided subject to, and without waiver of, the foregoing objection.

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

9. Verizon FL objects to each 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 Interrogatories purport to require more, Verizon FL objects on the grounds that compliance would impose an undue burden or expense.

### **INITIAL SPECIFIC OBJECTIONS**

In addition to the foregoing general objections, Verizon FL raises the following initial specific objections to the following individual Interrogatories in AT&T's Third Set of Interrogatories:



- 13. If yes, please provide the following information for the three largest (based on total access lines served) central offices that provide switched services where collocations are not located in the buildings:**
- a. The total power plant rectifier capacity.**
  - b. The total inventory of manufacturer's List 1 drains for the equipment installed in the central office.**
  - c. The latest inventory of the total current usage measurements of the power plant that depicts the total usage.**

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Interrogatory on the grounds that it seeks information related solely to the technical phase of this proceeding, which is now closed. Specifically, AT&T is seeking to challenge the testimony given at the technical hearing by witnesses for all three ILECs that BellSouth, Sprint, and Verizon FL build power on a committed basis. But AT&T could have sought this information through discovery in advance of the technical hearing, and it could have — and did — cross-examine the ILEC witnesses at that hearing. The technical record is now closed, and it is thus too late to pursue such information.

In addition, this Interrogatory seeks information in formats not maintained by Verizon FL. While Verizon FL has produced — and will continue to produce — relevant workpapers and other information in the formats used by Verizon FL, it is under no obligation to create new files for purposes of discovery.

- 14. For the three largest (based on access lines served) central offices that provide switched services where collocations are located in the central office building, please provide the following information:**
- a. The total power plant rectifier capacity.**
  - b. The total inventory of manufacturer's List 1 drains for the equipment installed in the central office.**
  - c. The latest inventory of the total current usage measurements of the power plant that depicts the total usage.**

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In addition, this Interrogatory seeks information in formats not maintained by Verizon FL. While Verizon FL has produced — and will continue to produce — relevant workpapers and other information in the formats used by Verizon FL, it is under no obligation to create new files for purposes of discovery.

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Dated: September 5, 2003

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