

ORIGINAL



Susan S. Masterton
Attorney

Law/External Affairs
FITLH00107
Post Office Box 2214
1313 Blair Stone Road
Tallahassee, FL 32316-2214
Voice 850 599 1560
Fax 850 878 0777
susan.masterton@mail.sprint.com

September 8, 2003

Ms. Blanca S. Bayó, Director
Division of the Commission Clerk
& Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RECEIVED FPSC
SEP - 8 PM 4: 13
COMMISSION
CLERK

Re: Docket No. 981834-TP & 990321-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint are the original and 15 copies of the Sprint Florida, Incorporated's General Objections to AT&T Communications of the Southern States, LLC's Third Set of Interrogatories (Nos. 15-17).

Copies are being served on the parties in this docket via electronic and US mail.

Please acknowledge receipt of this filing by stamping and initialing a copy of this letter and returning same to the courier. If you have any questions, please do not hesitate to call me at 850/599-1560.

Sincerely,

Susan S. Masterton

RECEIVED & FILED
FPSC-BUREAU OF RECORDS

Enclosure

AUS _____
CAF _____
CMP _____
COM _____
CTR _____
ECR _____
GCL _____
OPC _____
MMS _____
SEC 1 _____
OTH _____

DOCUMENT NUMBER-DATE
08443 SEP-8 8
FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
DOCKET NO. 981834-TP & 990321-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail & U.S. mail this 08th Day of September, 2003 to the following:

Adam Teitzman, Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0870

Nancy B. White
c/o Nancy H. Sims
BellSouth Telecommunications, Inc.
150 S. Monroe Street Suite 400
Tallahassee, Florida 32301-1556

Pennington Law Firm
Peter Dunbar/Marc W. Dunbar
Post Office Box 1009
Tallahassee, Florida 32302

Florida Cable Telecommunications
Association, Incorporated
Michael A. Gross
246 E. 6th Avenue, Suite 100
Tallahassee, FL 32303

FCCA
c/o McWhirter Law Firm
Vicki Kaufman
117 S. Gadsden Street
Tallahassee, Florida 32301

MCI WorldCom Communications, Inc.
Donna McNulty
1203 Governors Square Blvd. Suite 201
Tallahassee, Florida 32301-2960

Messer Law Firm
Floyd Self/Norman Horton
Post Office Box 1876
Tallahassee, Florida 32302

MediaOne Florida
Telecommunications, Inc.
c/o Laura L. Gallagher, P.A.
101 E. College Ave., Suite 302
Tallahassee, Florida 32301

AT&T Communications of the
Southern States, Inc.
Tracy W. Hatch
101 North Monroe Street, Suite 700
Tallahassee, Florida 32301-1549

Katz, Kutter Law Firm
Charles Pellegrini/Patrick Wiggins
12th Floor
106 East College Avenue
Tallahassee, Florida 32301

Supra Telecommunications &
Information Systems, Inc.
Mark E. Buechele
2620 S.W. 27th Avenue
Miami, FL 33133

Verizon-Florida, Incorporated
Richard Chapkis c/o David Christian
106 East College Avenue, Suite 810
Tallahassee, Florida 32301-7704

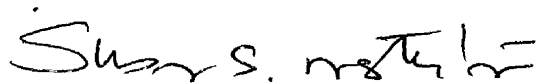
ITC^DeltaCom Communications, Inc.
Nanette Edwards
Messer, Caparello & Self
Post Office Box 1876
Tallahassee, Florida 32302-1876

Network Telephone Corporation
Brent E. McMahan
815 South Palafox Street
Pensacola, FL 32501-5937

KMC Telecom, Inc.
Mr. John D. McLaughlin, Jr.
1755 North Brown Road
Lawrenceville, GA 30043-8119

Florida Digital Network, Inc.
Matthew Feil, Esq.
390 North Orange Ave., Suite 2000
Orlando, FL 32801

Beth Keating, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0870



Susan S. Masterton

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: September 8, 2003

**SPRINT -FLORIDA, INCORPORATED'S GENERAL OBJECTIONS TO
AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC'S
THIRD SET OF INTERROGATORIES (Nos. 15-17)**

Sprint-Florida, Incorporated ("Sprint"), pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.340 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following Objections to AT&T Communications of the Southern States, LLC's ("AT&T's") Third Set of Interrogatories (Nos. 15-17).

INTRODUCTION

The objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the ten-day requirement set forth in Order No. PSC-02-1513-PCO-TP ("Procedural Order") issued by the Florida Public Service Commission ("Commission") in the above-referenced docket. Should additional grounds for objection be discovered as Sprint prepares its responses to the above-referenced requests, Sprint reserves the right to supplement, revise, or modify its objections at the time that it serves its responses on AT&T. Moreover, should Sprint determine that a Protective Order is necessary with respect to any of the material

requested by AT&T, Sprint reserves the right to file a motion with the Commission seeking such an order at the time that it serves its answers and responses on AT&T.

GENERAL OBJECTIONS

Sprint makes the following General Objections to AT&T's Third Set of Interrogatories (Nos. 15-17) ("Third IRR"). These general objections apply to each of the individual requests and interrogatories in the Third IRR, respectively, and will be incorporated by reference into Sprint's answers when they are served on AT&T.

1. Sprint objects to the requests to the extent that such requests seek to impose an obligation on Sprint to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such requests are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. Sprint has interpreted AT&T's requests to apply to Sprint's regulated intrastate operations in Florida and will limit its responses accordingly. To the extent that any request is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission, Sprint objects to such request to produce as irrelevant, overly broad, unduly burdensome, and oppressive.

3. Sprint objects to each and every request and instruction to the extent that such request or instruction calls for information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. Sprint objects to each and every request insofar as the request is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these requests. Any responses provided by Sprint to AT&T's requests will be provided subject to, and without waiver of, the foregoing objection.

5. Sprint objects to each and every request insofar as the request is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. Sprint will attempt to note in its responses each instance where this objection applies.

6. Sprint objects to AT&T's discovery requests, instructions and definitions, insofar as they seek to impose obligation on Sprint that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

7. Sprint objects to providing information to the extent that such information is already in the public record before the Commission, or elsewhere.

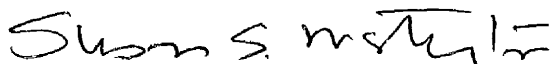
8. Sprint objects to each and every request, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. Sprint objects to each and every request to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that AT&T's requests proprietary confidential business information which is not subject to the "trade secrets" privilege, Sprint will make such information available to counsel for AT&T pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

10. Sprint is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, Sprint 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. Therefore, it is possible that not every document will be provided in response to these discovery requests. Rather, Sprint's responses will provide, subject

to any applicable objections, all of the information obtained by Sprint after a reasonable and diligent search conducted in connection with these requests. Sprint shall conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the discovery requests purport to require more, Sprint objects on the grounds that compliance would impose an undue burden or expense. To the extent that AT&T requests herein documents that have previously been produced to other parties in response to previous discovery, then without limiting any of the foregoing objections, Sprint incorporates herein by reference its objections to that previous discovery.

DATED this 8th day of September 2003.



SUSAN S. MASTERTON
P.O. Box 2214
Tallahassee, FL 32316-2214
(850) 599-1560 (phone)
(850) 878-0777 (fax)
susan.masterton@mail.sprint.com

ATTORNEY FOR SPRINT