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September 10, 2003

BY HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 030868-TL

Dear Ms. Bayo:

Enclosed for filing in the above matter are the original and fifteen (15) copies of Sprint's Objections to Citizens' First Set of Interrogatories (Nos. 1-26).

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Yours truly,



John P. Fons

Enclosures

cc: Certificate of Service List

DOCUMENT NUMBER 030868-TL

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: SPRINT-FLORIDA, INCORPORATED'S
PETITION TO REDUCE INTRASTATE
SWITCHED NETWORK ACCESS RATES TO
INTERSTATE PARITY IN A REVENUE
NEUTRAL MANNER PURSUANT TO
SECTION 364.164(1), FLORIDA STATUTES

DOCKET NO. 030868-TL
FILED: September 10, 2003

**SPRINT'S OBJECTIONS TO CITIZENS'
FIRST SET OF INTERROGATORIES (NOS. 1-26)**

Sprint-Florida, Incorporated ("Sprint"), pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.280 and 1.340, Florida Rules of Civil Procedure, hereby files the following Objections to the Citizens of Florida's ("Citizens") First Set of Interrogatories (Nos. 1-26)("Interrogatories"), dated September 3, 2003.

The objections stated herein are preliminary in nature and are made at this time to comply with the 5-day requirement set forth in Order No. PSC-03-0994-PCO-TL, issued September 4, 2003, at pages 3 and 4. Should additional grounds for objection be discovered as Sprint prepares its responses to the above-referenced interrogatories, Sprint reserves the right to supplement, revise, or modify its objections at the time it serves its responses.

GENERAL OBJECTIONS

Sprint makes the following general objections to Citizens' First Set of Interrogatories (Nos. 1-26). These general objections apply to each of the individual interrogatories, respectively, and will be incorporated by reference into Sprint's answers when they are served on Citizens.

1. Sprint objects to each interrogatory to the extent that such interrogatory seeks information which is beyond the scope of discovery permitted in this proceeding as set forth at Section 364.164, subsections (3) and (4), Florida Statutes, or seeks information which is beyond the scope of those issues the Legislature has determined are to be considered by the Commission in this proceeding, or is beyond matters contained in Sprint's testimony and exhibits addressing those same issues.

2. Sprint objects to the interrogatories to the extent they 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 interrogatories are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

3. Sprint objects to the interrogatories to the extent that they are intended to apply to matters other than Sprint's Florida intrastate operations subject to the jurisdiction of the Commission. Sprint objects to such interrogatories as being irrelevant, overly broad, unduly burdensome, and oppressive.

4. Sprint objects to each and every interrogatory and related instructions to the extent that an interrogatory or instruction calls for information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

5. Sprint objects to each and every interrogatory insofar as the interrogatories are vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these interrogatories. Any answers provided by Sprint in response to the interrogatories will be provided subject to, and without waiver of, the foregoing objection.

6. Sprint objects to each and every interrogatory insofar as it 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.

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

8. Sprint objects to Citizens' interrogatories, instructions and definitions, insofar as they seek to impose obligations on Sprint that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

9. Sprint objects to each and every interrogatory insofar as any of them are unduly burdensome, expensive, oppressive, or excessively time consuming as written.

10. Sprint objects to each and every interrogatory to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that Citizens request proprietary confidential business information which is not subject to the "trade secrets" privilege, Sprint will make such information available in accordance with the Protective Order sought by Sprint in this docket, subject to any other general or specific objections contained herein.

11. 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 has been identified in response to these requests. Sprint 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, Sprint objects on the grounds that compliance would impose an undue burden or expense.

SPECIFIC OBJECTIONS

In addition to the foregoing general objections, Sprint raises the following specific objections to the following individual interrogatories. As noted previously, should additional grounds for objections be discovered as Sprint prepares its responses to the above-referenced interrogatories, Sprint reserves the right to supplement, revise or modify its objections at the time it serves its responses.

- 1. Provide Sprint PCS's intrastate access rates and associated terms and conditions for each wireless carrier and interexchange carrier with which Sprint PCS interconnects within the state of Florida.**

Sprint-Florida objects to Interrogatory No. 1 on the grounds that this interrogatory seeks discovery of matters that are beyond the scope of the issues to be considered by the Commission in this proceeding and are directed to an entity that is beyond the jurisdiction of this Commission.

- 5. Explain how Sprint calculates the costs of SS7 signaling costs required for vertical services.**

Sprint-Florida objects to Interrogatory No. 5 on the grounds that, as written, this interrogatory cannot be answered without clarification as to what precise information Citizens are seeking. To the extent Citizens clarify their request, Sprint-Florida will attempt to provide the requested information.

6. Explain how Sprint calculates the costs of SS7 signaling costs required by CLECs in its UNE pricing.

Sprint-Florida objects to Interrogatory No. 6 on the grounds that, as written, this interrogatory cannot be answered without clarification as to what precise information Citizens are seeking. To the extent Citizens clarify their request, Sprint-Florida will attempt to provide the requested information.

16. Referring to the testimony of witness Felz, page 9, lines 3-4, where he states that the current rate of intrastate switched access is currently \$.050392 per minute of use (per end) and the current cost is \$.004475, please state the intrastate switched access cost per minute of use (per end) that the company submitted in Docket No. 12765--TL, Docket No. 8609874-TL, Docket No. 891239-TL and Docket No. 910980-TL.

Sprint-Florida objects to Interrogatory No. 16 on the grounds that this interrogatory seeks discovery of information which, to the extent it exists, can be found in the Commission's files, which files are available to Citizens. To Sprint-Florida's knowledge, such information does not exist.

17. Referring to BellSouth witness Hendrix testimony in this docket, please state the amount of Sprint revenue that would be produced by Sprint using the two different methodologies that were presented to the Commission by Mr. Hendrix.

Sprint-Florida objects to Citizens' Interrogatory No. 17 on the grounds that this interrogatory requires Sprint-Florida to make a calculation using a methodology not adopted by Sprint-Florida. Subject to this objection, Sprint-Florida will provide the amount.

18. Referring to the testimony of witness Felz, page 20, lines 14-22, please list all basic local telecommunications services that were not proposed for increases by the company, excluding Lifeline and pay telephone services.

Sprint-Florida objects to Citizens' Interrogatory No. 18 on the grounds that this interrogatory seeks discovery of matters that are beyond the scope of the issues to be considered by the Commission in this proceeding. Subject to this objection, Sprint-Florida will attempt to provide the requested information to the extent such information exists.

- 19. Referring to the testimony of witness Felz, page 26, lines 3-10, please state whether Sprint has calculated any price elasticity or repression analysis based on the increases proposed in this docket and the title and dates of such studies, and the amount of repression for residence and business services stated separately.**

Sprint-Florida objects to Citizens' Interrogatory No. 19 on the grounds that this interrogatory seeks discovery of matters for which discovery is not permitted by the Florida Statutes governing this proceeding. Additionally, this discovery request is beyond the scope of the issues to be considered by the Commission in this proceeding. Subject to this objection, Sprint-Florida will attempt to provide such information to the extent such information exists.

- 20. Please state the company names and states where Sprint has affiliates that provide competitive local exchange services.**

Sprint-Florida objects to Citizens' Interrogatory No. 20 on the grounds that this interrogatory seeks discovery of matters that are outside the jurisdiction of this Commission. Additionally, the discovery seeks information about matters that are beyond the scope of the issues to be considered by the Commission in this proceeding.

- 21. Please state the originating and terminating switched access rates that are charged by each of Sprint's affiliated CLECs.**

Sprint-Florida objects to Citizens' Interrogatory No. 21 on the grounds that this interrogatory seeks discovery of matters that are outside the jurisdiction of this Commission. Additionally, the

discovery seeks information about matters that are beyond the scope of the issues to be considered by the Commission in this proceeding.

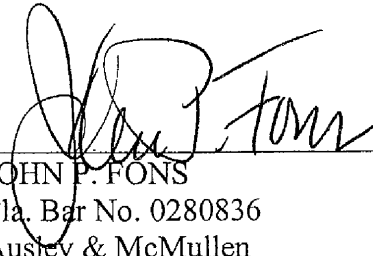
22. Referring to the testimony of witness Staihr, page 12, lines 18-23, please provide the comparable percentage of CLEC entry in the three states served by Sprint that have the highest rates.

Sprint-Florida objects to Citizens' Interrogatory No. 22 on the grounds that, as written, this interrogatory is unclear and requires Sprint-Florida to speculate as to the precise information Citizens are seeking. To the extent Citizens clarify their request, Sprint-Florida will attempt to provide such information to the extent such information exists.

23. Please state the basic residential rates that are charged in the three states served by Sprint that have the highest rates.

Sprint-Florida objects to Citizens' Interrogatory No. 23 on the grounds that, as written, this interrogatory is unclear and requires Sprint-Florida to speculate as to the precise information Citizens are seeking. To the extent Citizens clarify their request, Sprint-Florida will attempt to provide such information to the extent such information exists.

RESPECTFULLY SUBMITTED,

A handwritten signature in black ink, appearing to read "John P. Fons", is written over a horizontal line.

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ATTORNEYS FOR SPRINT-FLORIDA,
INCORPORATED

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by

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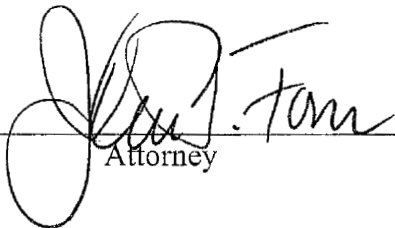
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