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September 12, 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

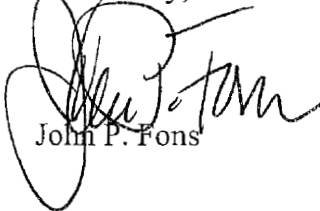
Dear Ms. Bayo:

Enclosed for filing in the above matter are the original and fifteen (15) copies of Sprint's Objections to Citizens' Second Set of Interrogatories (Nos. 27-42).

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 DATE

08640 SEP 12 8

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 12, 2003

**SPRINT'S OBJECTIONS TO CITIZENS'
SECOND SET OF INTERROGATORIES (NOS. 27-42)**

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 General Objections to the Citizens of Florida's ("Citizens") Second Set of Interrogatories (Nos. 27-42) ("Interrogatories"), dated September 5, 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' Second Set of Interrogatories (Nos. 27-42). 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 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.

- 27. Provide the company's (and/or the related long distance affiliate) intrastate pricing units/volumes separately for MTS, and all "other optional calling plans" (all "other optional calling plans" should be provided separately if available, or on a combined basis), and provide this information for both residential and business customers. The above information should be provided for day, evening, and night/weekend categories. The information should be provided for both the test period, and the year prior to the test period.**

Sprint-Florida objects to Citizens' Interrogatory No. 27 on the grounds that this interrogatory seeks the discovery of matters that are beyond the scope of the issues to be considered by the Commission in this proceeding. The matters about which this interrogatory seeks discovery relate to end-user long distance services, but end-user long distance services are not a subject of Sprint-Florida's Petition. To the extent end-user long distance service prices will be impacted by granting Sprint-Florida's Petition to reduce access charges, the resulting long distance prices are governed by a separate statutory provision; namely, Section 364.163(2), Florida Statutes. For purposes of addressing Sprint-Florida's Petition, the Commission must assume that the flow-through of access rate reductions by an intrastate interexchange telecommunications company required by Section 364.163(2), Florida Statutes, will take place as required. Additionally, any

inquiry about, or request for, "pricing unit" information beyond the most recent 12-month period is beyond the scope of inquiry permitted by Section 364.164(3), Florida Statutes.

- 28. Provide the company's (and/or the related long distance affiliate) average revenues per minute separately for MTS, and all "other optional calling plans" (all "other optional calling plans" should be provided separately if available, or on a combined basis), and provide this information for both residential and business customers. The information should be provided for both the test period, and each of the two years prior to the test period.**

Sprint-Florida objects to Citizens' Interrogatory No. 28 on the grounds that this interrogatory seeks the discovery of matters that are beyond the scope of the issues to be considered by the Commission in this proceeding. The matters about which this interrogatory seeks discovery relate to end-user long distance services, but end-user long distance services are not a subject of Sprint-Florida's Petition. To the extent end-user long distance service prices will be impacted by granting Sprint-Florida's Petition to reduce access charges, the resulting long distance prices are governed by a separate statutory provision; namely, Section 364.163(2), Florida Statutes. For purposes of addressing Sprint-Florida's Petition, the Commission must assume that the flow-through of access rate reductions by an intrastate interexchange telecommunications company required by Section 364.163(2), Florida Statutes, will take place as required. Additionally, any inquiry about, or request for, "pricing unit" information beyond the most recent 12-month period is beyond the scope of inquiry permitted by Section 364.164(3), Florida Statutes.

- 29. Provide the average intrastate toll/long distance usage charges (billed/invoiced amount) separately for customers of residential MTS, all other combined residential "optional calling plans", business MTS, and all other combined business "optional calling plans". Provide this information for the test period and the prior twelve months. Explain if this includes any PICC charges.**

Sprint-Florida objects to Citizens' Interrogatory No. 29 on the grounds that this interrogatory seeks the discovery of matters that are beyond the scope of the issues to be considered by the Commission in this proceeding. The matters about which this interrogatory seeks discovery relate to end-user long distance services, but end-user long distance services are not a subject of Sprint-Florida's Petition. To the extent end-user long distance service prices will be impacted by granting Sprint-Florida's Petition to reduce access charges, the resulting long distance prices are governed by a separate statutory provision; namely, Section 364.163(2), Florida Statutes. For purposes of addressing Sprint-Florida's Petition, the Commission must assume that the flow-through of access rate reductions by an intrastate interexchange telecommunications company required by Section 364.163(2), Florida Statutes, will take place as required. Additionally, any inquiry about, or request for, "pricing unit" information beyond the most recent 12-month period is beyond the scope of inquiry permitted by Section 364.164(3), Florida Statutes.

30. **Assume that the company's proposal is adopted. Provide all information to show that the decrease in residential long distance rates (from the flow-through impact) will equal or exceed the increase in residential local rates. Provide all supporting calculations, assumptions, and explanations, and provide information in electronic format. Explain how this can be determined if the time period that long distance rate reductions will be in place is not known or determinable.**

Sprint-Florida objects to Citizens' Interrogatory No. 30 on the grounds that this interrogatory seeks the discovery of matters that are beyond the scope of the issues to be considered by the Commission in this proceeding. The matters about which this interrogatory seeks discovery relate to end-user long distance services, but end-user long distance services are not a subject of Sprint-Florida's Petition. To the extent end-user long distance service prices will be impacted by granting Sprint-Florida's Petition to reduce access charges, the resulting long distance prices are governed by a separate statutory provision; namely, Section 364.163(2), Florida Statutes. For

purposes of addressing Sprint-Florida's Petition, the Commission must assume that the flow-through of access rate reductions by an intrastate interexchange telecommunications company required by Section 364.163(2), Florida Statutes, will take place as required.

31. **Assuming that the company's proposal is adopted without changes (and that the company, and/or its long distance affiliate would flow-through the rate reductions) provide the company's best estimate of the flow-through impact on reduced long distance rates for the company (and/or its long distance affiliate), and reduced long distance rates generally for all of the Florida long distance market for all other carriers. In addition, assuming that the proposals for the other two LECs are adopted without change, provide the company's best estimate of how the combined flow-through impact of all LECs affects the long distance rates generally for all of the Florida long distance market for all other carriers. This information can be expressed as the best estimate impact of the reduction in average long distance revenues per minute, or some other basis for long distance rates. Provide all supporting calculations and explanations.**

Sprint-Florida objects to Citizens' Interrogatory No. 31 on the grounds that this interrogatory seeks the discovery of matters that are beyond the scope of the issues to be considered by the Commission in this proceeding. The matters about which this interrogatory seeks discovery relate to end-user long distance services, but end-user long distance services are not a subject of Sprint-Florida's Petition. To the extent end-user long distance service prices will be impacted by granting Sprint-Florida's Petition to reduce access charges, the resulting long distance prices are governed by a separate statutory provision; namely, Section 364.163(2), Florida Statutes. For purposes of addressing Sprint-Florida's Petition, the Commission must assume that the flow-through of access rate reductions by an intrastate interexchange telecommunications company required by Section 364.163(2), Florida Statutes, will take place as required.

- 32. Address the following regarding potential long distance rate reductions for the company (and/or its long distance affiliate):**
- a) Explain if the company (and/or its long distance affiliate) will flow-through access reductions to long distance rates, and provide its best estimates of rates it will offer for each long distance service assuming its rebalancing proposal is adopted. Explain why the company will not reduce rates if this is the case.**
 - b) Explain the time period the company will maintain its reduced long distance rates, before it subsequently increases long distance rates and explain the rationale for this approach.**
 - c) Explain if the company will lower its “intrastate” long distance rates to match (or go below) the rates of all similar lower priced “interstate” long distance rates. Provide a list of these long distance services, and explain why the company will or will not reduce its intrastate rates to match (or go below) interstate rates.**

Sprint-Florida objects to Citizens' Interrogatory No. 32 a) thru c) on the grounds that this interrogatory seeks the discovery of matters that are beyond the scope of the issues to be considered by the Commission in this proceeding. The matters about which this interrogatory seeks discovery relate to end-user long distance services, but end-user long distance services are not a subject of Sprint-Florida's Petition. To the extent end-user long distance service prices will be impacted by granting Sprint-Florida's Petition to reduce access charges, the resulting long distance prices are governed by a separate statutory provision; namely, Section 364.163(2), Florida Statutes. For purposes of addressing Sprint-Florida's Petition, the Commission must assume that the flow-through of access rate reductions by an intrastate interexchange telecommunications company required by Section 364.163(2), Florida Statutes, will take place as required.

- 33. Assume that the LEC (and/or its long distance affiliate) and other long distance carriers will flow-through long distance rate reductions to customers. Explain what actions the Florida Commission should take if the LEC and/or other long distance carriers subsequently increase their long distance rates (to negate all or some impact of the access flow-through) within a 6-month period, 1 year period, or some other period. Explain why local rates should be permanently increased if long distance rates will not be permanently decreased, or at least decreased for some substantial time period.**

Sprint-Florida objects to Citizens' Interrogatory No. 33 on the grounds that this interrogatory seeks the discovery of matters that are beyond the scope of the issues to be considered by the Commission in this proceeding. The matters about which this interrogatory seeks discovery relate to end-user long distance services, but end-user long distance services are not a subject of Sprint-Florida's Petition. To the extent end-user long distance service prices will be impacted by granting Sprint-Florida's Petition to reduce access charges, the resulting long distance prices are governed by a separate statutory provision; namely, Section 364.163(2), Florida Statutes. For purposes of addressing Sprint-Florida's Petition, the Commission must assume that the flow-through of access rate reductions by an intrastate interexchange telecommunications company required by Section 364.163(2), Florida Statutes, will take place as required.

- 35. Explain all proof that access reductions will be flowed through equitably to both residential and business customers of the LEC (and/or its long distance affiliate) and other carriers, or indicate if carriers could choose to flow-through the entire impact of the access reduction to business long distance customers (and not residential long distance customers). Provide all information to support the company's statements or opinion.**

Sprint-Florida objects to Citizens' Interrogatory No. 35 on the grounds that this interrogatory seeks the discovery of matters that are beyond the scope of the issues to be considered by the Commission in this proceeding. The matters about which this interrogatory seeks discovery relate to end-user long distance services, but end-user long distance services are not a subject of

Sprint-Florida's Petition. To the extent end-user long distance service prices will be impacted by granting Sprint-Florida's Petition to reduce access charges, the resulting long distance prices are governed by a separate statutory provision; namely, Section 364.163(2), Florida Statutes. For purposes of addressing Sprint-Florida's Petition, the Commission must assume that the flow-through of access rate reductions by an intrastate interexchange telecommunications company required by Section 364.163(2), Florida Statutes, will take place as required.

- 36. Provide all known, quantifiable and explicit “net” benefits (“net” benefits implies showing both “positive” and “negative” impacts and showing that the positive impacts exceed the negative impacts) that will accrue to the average residential customer as a result of the access reduction and rebalance to local rates, assuming the company’s proposal is adopted. Also, provide the known duration (time period) of each benefit. Benefits may include (but not be limited to) net reductions in rates paid by customers, and any other benefits determined by the company.**

Sprint-Florida objects to Citizens' Interrogatory No. 36 on the grounds that this interrogatory seeks the discovery of matters that are beyond the scope of the issues to be considered by the Commission in this proceeding. The "benefits" to residential consumers to be considered by the Commission are specified in Section 364.164(1), Florida Statutes.

- 39. Provide an explanation of all increases in residential long distance rates for each service for the period January 2000 to the most recent date. For each service, provide the prior rate (and the date), the increased rate, (and date of increase) and an explanation of the reason for the increase in long distance rates.**

Sprint-Florida objects to Citizens' Interrogatory No. 39 on the grounds that this interrogatory seeks the discovery of matters that are beyond the scope of the issues to be considered by the Commission in this proceeding. The matters about which this interrogatory seeks discovery relate to end-user long distance services, but end-user long distance services are not a subject of Sprint-Florida's Petition. To the extent end-user long distance service prices will be impacted by

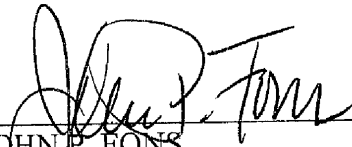
granting Sprint-Florida's Petition to reduce access charges, the resulting long distance prices are governed by a separate statutory provision; namely, Section 364.163(2), Florida Statutes. For purposes of addressing Sprint-Florida's Petition, the Commission must assume that the flow-through of access rate reductions by an intrastate interexchange telecommunications company required by Section 364.163(2), Florida Statutes, will take place as required.

40. Address the following regarding long distance rates:

- a) For the company (and/or its long distance affiliate) operations in Florida, provide a comparison and brief description of all current residential long distance calling plans and a comparison of the rates available on an “intrastate” basis and an “interstate” basis. Identify those similar “intrastate” and “interstate” long distance plans, and explain the reason for any difference in rates.**
- b) Explain if this situation of having different intrastate and interstate rates for similar calling plans is unique to the company’s Florida operations, or if it is unique to states which have not rebalanced local rates and provide documentation to support this (such as comparing rates in other states of the company operations, including states which have and have not rebalanced local rates).**
- c) For the company (and/or its long distance affiliate) operations in Florida, provide the name and a brief description of all current residential long distance calling plans that are available on an “interstate” basis, but not an “intrastate” basis. Explain why this situation exists and provide documentation to support this.**
- d) Explain if this situation of having certain “interstate” long distance calling plans (but not similar “intrastate” plans) is unique to the company’s Florida operations, or if it is unique to states which have not rebalanced local rates and provide documentation to support this (such as comparing rates in other states of the company operations, including states which have and have not rebalanced local rates).**
- e) For items (a) through (d) above, address these issues as it relates to those states which have rebalanced local rates in the past few years per the testimony of Dr. Gordon (i.e, California, Illinois, Ohio, Massachusetts, Maine and others).**

Sprint-Florida objects to Citizens' Interrogatory No. 40 a) thru e) on the grounds that this interrogatory seeks the discovery of matters that are beyond the scope of the issues to be considered by the Commission in this proceeding. The matters about which this interrogatory seeks discovery relate to end-user long distance services, but end-user long distance services are not a subject of Sprint-Florida's Petition. To the extent end-user long distance service prices will be impacted by granting Sprint-Florida's Petition to reduce access charges, the resulting long distance prices are governed by a separate statutory provision; namely, Section 364.163(2), Florida Statutes. For purposes of addressing Sprint-Florida's Petition, the Commission must assume that the flow-through of access rate reductions by an intrastate interexchange telecommunications company required by Section 364.163(2), Florida Statutes, will take place as required. Additionally, any inquiry about, or request for, "pricing unit" information beyond the most recent 12-month period is beyond the scope of inquiry permitted by Section 364.164(3), Florida Statutes.

RESPECTFULLY SUBMITTED,



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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 U.S. Mail, e-mail or hand delivery (*) this 12th day of September, 2003, to the following:

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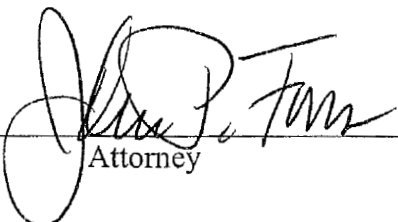
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