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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

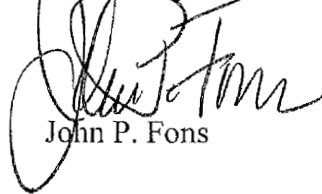
Dear Ms. Bayo:

Enclosed for filing in the above matter are the original and fifteen (15) copies of Sprint's Objections to Citizens' Second Request for Production of Documents (Nos. 25-29).

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
08641 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
REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 25-29)**

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") Second Request for Production of Documents (Nos. 25-29) ("PODs"), 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 PODs, 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 Request for Production of Documents (Nos. 25-29). These general objections apply to each of the individual requests, respectively, and will be incorporated by reference into Sprint's answers when they are served on Citizens.

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

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

3. Sprint objects to the PODs 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 PODs as being irrelevant, overly broad, unduly burdensome, and oppressive.

4. Sprint objects to each and every POD and related instructions to the extent such POD 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 POD insofar as the PODs 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 PODs. Any documents provided by Sprint in response to the PODs will be provided subject to, and without waiver of, the foregoing objection.

6. Sprint objects to each and every POD 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' discovery requests, 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 POD, insofar as any of them are unduly burdensome, expensive, oppressive, or excessively time consuming.

10. Sprint objects to each and every POD 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 PODs 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 requests. As noted previously, should additional grounds for objections 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 it serves its responses.

- 25. Provide, in electronic format, 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. Please also provide all supporting documents.**

Sprint-Florida objects to Citizens' POD No. 25 on the grounds that this POD 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 POD 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.

26. **Provide, in electronic format, 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. Please provide all supporting documents.**

Sprint-Florida objects to Citizens' POD No. 26 on the grounds that this POD 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 POD 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.

27. **Provide, in electronic format, 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. Please also provide all supporting documents.**

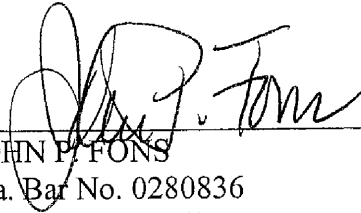
Sprint-Florida objects to Citizens' POD No. 27 on the grounds that this POD seeks the discovery of matters that are beyond the scope of the issues to be considered by the Commission in this proceeding. The matters about which this POD seeks discovery relate to end-user long distance

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. Assume that the company's proposal is adopted. Provide all documents in your possession, custody or control 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. Please provide information in electronic format.**

Sprint-Florida objects to Citizens' POD No. 28 on the grounds that this POD 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 POD 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.

RESPECTFULLY SUBMITTED,

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

JOHN P. FONS
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and

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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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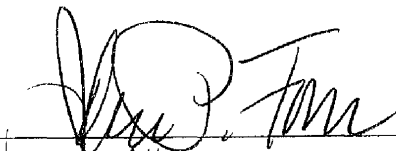
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