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September 18, 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

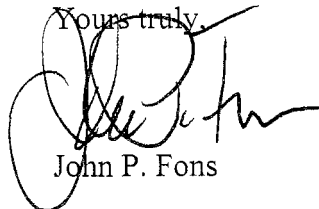
Dear Ms. Bayo:

Enclosed for filing in the above matter are the original and fifteen (15) copies of Sprint's Objections to Citizens' Third Request for Production of Documents (Nos. 30-39).

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 2411
08959 SEP 19 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 18, 2003

**SPRINT'S OBJECTIONS TO CITIZENS' THIRD
REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 30-39)**

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") Third Request for Production of Documents (Nos. 30-39) ("PODs"), dated September 11, 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' Third Request for Production of Documents (Nos. 30-39). These general objections apply to each of the individual requests, respectively, and will be incorporated by reference into Sprint's responses 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.

30. Provide a copy of all internal data made available to Dr. Gordon, and which he relied upon or used regarding statements and conclusions in his testimony (and provide this information in electronic format where applicable). If this information will not be provided, explain all reasons why each specific type of information will not be provided.

Sprint-Florida objects to Citizens' POD No. 30 on the grounds that this POD seeks the disclosure of information which is exempt from discovery pursuant to the attorney-client and attorney work product doctrines.

31. Please refer to Citizens' interrogatories Nos. 44a, b, and c. Dr. Gordon, at page 24, lines 21 to 25, and page 25, lines 1 to 4), and at other places of his testimony, indicates that the company faces competition from alternative sources (i.e., wireless, IP telephony, e-mail, etc.). If it is the company's position that this information is relevant to its case, please address the following and provide the documents as requested in **bold type**.
- a) Provide the number of lines that Sprint has lost to its wireless affiliate in Florida for each of the past three years (or for the period for which this information is available) **and provide supporting documentation for this information**. Explain if these lines lost to wireless affiliates represented "primary" or "second" lines and **provide all supporting documents to show this**. Provide all of this information separately for both residential and business lines if known.
 - b) Provide the number of DSL lines and DSL revenues (by type of DSL service, and shown separately for residence and business customers), for Sprint (and the related Sprint DSL affiliate in Florida, if applicable) for each of the past three years (or for the period for which this information is available) **and provide supporting documentation for this information**. Explain if this resulted in a net increase or decrease in the number of lines served by the company (the telephone company, not the DSL affiliate) over this period and **provide all**

supporting documentation. Confirm that the “access line” used to provide DSL service by the DSL affiliate is recorded as revenues on the telephone company books (and not the books of the DSL affiliate), and that the “access line” used to provide DSL service by the DSL affiliate is reflected in residence and business access line counts of the telephone company (and not the DSL affiliate). Provide the account name and account number where these revenues are recorded on the telephone company’s books, and indicate if these lines and revenues are recorded as intrastate revenues, or if they are treated as interstate revenues, deregulated revenues, or other (and explain the treatment).

- c) If known, provide the number of Sprint lines lost to unaffiliated wireless carriers, and to unaffiliated DSL carriers, for each of the three past years (or the period for which this is available), **and provide supporting documentation for this information.** Explain if these lines lost to wireless and DSL competitors represented “primary” or “second” lines **and provide all supporting documents to show this.** Provide all of this information separately for both residential and business lines if known.

Sprint-Florida objects to Citizens' POD No. 31 b) on the grounds that this POD seeks discovery of matters that are beyond the scope of the issues to be considered by the Commission in this proceeding and are not reasonably calculated to lead to the discovery of admissible evidence. Additionally, this POD requests information which is not relevant to any matter set forth in Sprint-Florida's Petition or associated testimony or exhibits.

32. Provide copies of Sprint’s short and long range planning documents, business plans, strategic plans, and other similar documents reviewed by Sprint witnesses as part of their work effort, or which helped form the basis for any of their statements or conclusions.

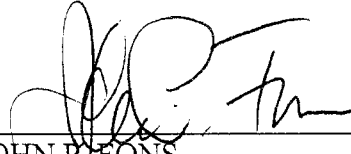
Sprint-Florida objects to Citizens' POD No. 32 on the grounds that this POD seeks the disclosure of confidential information. Subject to this objection, Sprint-Florida will provide such documents that are responsive to this POD.

33. Regarding the company’s position that long distance providers will be required to flow through access reductions, and this will result in reductions in toll and long distance rates, address the following:

If not previously provided, provide copies of residential MTS tariffs, and other residential calling plans, for the most recent three years showing changes in long distance rates for Sprint as a response to long distance competition.

Sprint-Florida objects to Citizens' POD No. 33 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,



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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 19th day of September, 2003, to the following:

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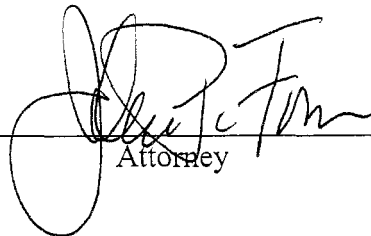
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