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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

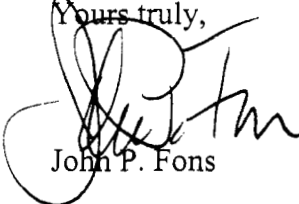
Re: Docket No. 030868-TL

Dear Ms. Bayo:

Enclosed for filing in the above matter are the original and fifteen (15) copies of Sprint's Objections to Citizens' Third Set of Interrogatories (Nos. 43-53).

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

08960 SEP 19 3

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 SET OF INTERROGATORIES (NOS. 43-53)**

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") Third Set of Interrogatories (Nos. 43-53) ("Interrogatories"), 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 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' Third Set of Interrogatories (Nos. 43-53). 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.

44. 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 please note that the requests for documents appearing in **bold type** in Nos. 44 a, b, and c, are properly addressed in Citizens' request for production of documents, Nos. 31a, 31b, and 31c, which accompanies the service of these interrogatories.
- 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' Interrogatory No. 44 b) 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 not reasonably calculated to lead to the discovery of admissible evidence. Additionally, this interrogatory requests information which is not relevant to any matter set forth in Sprint-Florida's Petition or associated testimony or exhibits.

46. 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 Sprint's proposal is adopted, explain the minimum and maximum amount of reduction in long distance MTS rates, and other calling plan rates, which Sprint (and/or Sprint long distance affiliates) could pass through for residential and business customers.

Sprint-Florida objects to Citizens' Interrogatory No. 46 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, this interrogatory requires information from an entity that is not a party to this proceeding.

49. If not previously provided, provide the following regarding toll minute volumes of the company and its competitors:
- a) Provide intrastate (shown separately for intraLATA and interLATA if available) toll minutes switched for all other IXC and long distance competitors for the test period in this case, and the prior twelve months. Explain the reasons for unusual or significant differences in volumes between these periods.
 - b) Provide intrastate (shown separately for intraLATA and interLATA if available) toll minutes switched for the company (the company's toll minutes and not the competitor's toll minutes). Explain the reasons for unusual or significant differences in volumes between these periods.
 - c) Regarding (a) and (b) above, provide all additional information necessary to determine the amount of total minute volumes for the company, and those related to long distance competitors, which are used in providing intrastate long distance toll in the state. Address this issue for the test period volumes in this case and the prior year volumes.
 - d) Provide interstate toll minutes switched for all other IXC and long distance competitors for the test period in this case, and the prior twelve months. Explain any reasons for unusual or significant differences in volumes between these periods.
 - e) Provide interstate (shown separately for intraLATA and interLATA if available) toll minutes switched for the company (the company's toll minutes and not the competitor's toll minutes). Explain any reasons for unusual or significant differences in volumes between these periods.
 - f) Regarding (d) and (e) above, provide all additional information necessary to determine the amount of total minute volumes for the company, and those related to long distance competitors, which are used in providing interstate long distance toll long distance. Address this issue for the test period volumes in this case and the prior year volumes.

Sprint-Florida objects to Citizens' Interrogatory No. 49 a) through f) 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, "toll volume" information beyond the most recent 12-month period is beyond the scope of inquiry permitted by Section 364.164(3), Florida Statutes.

50. The company relies on the presence of various competitors in Florida, including wireline, wireless, DSL, and others. Address the following, and provide this information regarding competitor market share and lines in Florida from 2000 through the most recent date in 2003. Please note that the request for documents that appears in No. 50a, in **bold type**, is properly sought in Citizens' requests for production of documents, No. 38, which accompanies the service of these interrogatories.
- a) Separately provide the number of residence and business lines served by CLECs in the company's exchanges. Provide this information on an exchange specific basis. **Provide a copy of the source document (and all other documents) which the company used in determining these line counts for competitors.** Separately provide the number of 911 line counts/listings which the company used in the above numbers for residence and business lines.
 - b) If available, provide the above information in a format which shows the number of facility-based lines served by competitors, the number of UNE/UNE-P lines served by competitors, the number of resale wholesale lines served by competitors, lines served by other categories if known, and provide the number of

911 line counts/listings relied upon by the company and included in each of the prior categories. Also, provide the previous information showing lines separately for residence and business. Explain if "resale" lines that are considered lost to competitors are treated as having lost the entire line to the competitor (although not all revenues are lost to the competitor).

- c) Provide the company's total access lines by residence and business for all categories including, but not necessarily limited to: basic local residence (including measured, EAS and other); basic local business (including measured, EAS, and other); Centrex; ISDN; DSL; resale; and others by specific category.

Sprint-Florida objects to Citizens' Interrogatory No. 50 c) 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 not reasonably calculated to lead to the discovery of admissible evidence. Additionally, this interrogatory requests information which is not relevant to any matter set forth in Sprint-Florida's Petition or associated testimony or exhibits.

51. The company relies on the presence of various competitors in Florida, including wireline, wireless, DSL and others. Address the following, and provide this information regarding the determination of competitor market share (by using revenues) in Florida from 2000 through the most recent date in 2003:

- a) Provide the revenues which the company received from competitors for each of the categories (including, but not limited to), UNE loops, UNE-P, collocation, resale, switching, and other UNE revenues by category. Also, provide revenues from the access line (and any other recurring or nonrecurring revenues related to this component) used for providing DSL by the company's affiliate if applicable (or provided by Sprint for DSL, if applicable).
- b) Provide the revenues from the company's wireless affiliate.
- c) Provide the revenues from the company's DSL affiliate if applicable (or by Sprint, if it provides DSL), and provide these revenues by type of DSL. Show these revenues separately for residence and business customers.
- d) Provide the company's revenues from basic local service, private line, centrex, service connection charges and all other local service categories by account number and description. Provide these revenues separately for residence and business customers.

Sprint-Florida objects to Citizens' Interrogatory No. 51 a) through d) 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 not reasonably calculated to lead to the discovery of admissible evidence. This interrogatory also requests information which is not relevant to any matter set forth in Sprint-Florida's Petition or associated testimony or exhibits. Additionally, Interrogatory No. 51 b) requests information from an entity which is not subject to the jurisdiction of the Commission.

RESPECTFULLY SUBMITTED,



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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 13th day of September, 2003, to the following:

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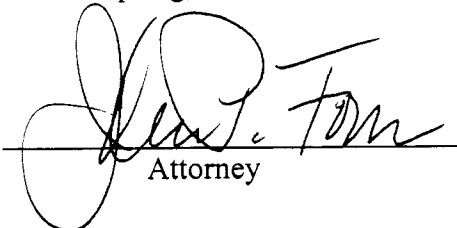
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