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JOHNNIE BYRD  
SPEAKER



September 23, 2003

Ms. Blanca S. Bayó, Director  
Division of the Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0870

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COMMISSION  
CLERK

RE: Docket No. 030868-TL

Dear Ms. Bayó:

Enclosed for filing in the above-referenced docket is the original and 1 copy of the Notice of Service of Citizens' second Motion to Compel Answers to Interrogatories from Sprint-Florida, Inc.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office

Sincerely,

H F. Rick Mann  
Associate Public Counsel

AUS \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
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Enclosures

DOCUMENT NUMBER-DATE

09115 SEP 23 03

FPSC-COMMISSION CLERK

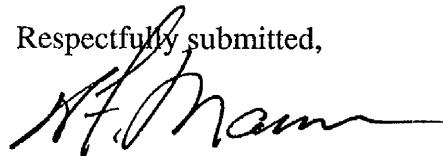
**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Petition of Sprint-Florida, Incorporated, )  
To reduce intrastate switched network ) Docket No. 030868-TL  
Access rates to interstate parity in )  
Revenue neutral manner pursuant to ) Filed September 23, 2003  
Section 364.164(1), Florida Statutes )  
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NOTICE OF SERVICE

Pursuant to Section 350.0611, Florida Statutes, the Citizens of the State of Florida, by and through Charlie Beck, Interim Public Counsel, serve this notice that they have served their second motion to compel answers to interrogatories from Sprint-Florida, Inc.

Respectfully submitted,



H F. Rick Mann  
Associate Public Counsel

Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street  
Room 812  
Tallahassee, FL 32399-1400

Attorney for the Citizens  
of the State of Florida

DOCUMENT NUMBER DATE

09115 SEP 23 8

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition by Sprint–Florida, Inc.     )  
To Reduce Its Network Access Charges     )  
Applicable To Intrastate Long Distance     )  
In A Revenue-Neutral Manner             )

Docket No. 030868-TL  
Filed: September 22, 2003

**CITIZENS' SECOND MOTION TO COMPEL ANSWERS TO  
INTERROGATORIES FROM SPRINT-FLORIDA, INC**

The Citizens of Florida (Citizens), through the Office of Public Counsel, pursuant to Rule 28-106.204, Florida Administrative Code, and Rules 1.280, 1.340, 1.350, and 1.380, Florida Rules of Civil Procedure, request that the Prehearing Officer issue an order compelling Sprint-Florida, Inc. (“Sprint” or “Company”) to immediately answer all interrogatories described in the following paragraphs.

1. On September 12, 2003, Sprint served its General and Specific Objections to Citizens’ Second Set of Interrogatories (Nos. 27-42), dated September 5, 2003.

2. Sprint lists eleven “General Objections” to Citizens’ discovery, asserting that every one of these “general objections” applies “to each of the individual requests, respectively . . .” This is asserted despite the fact that the Company does not list each and every one of Citizens’ interrogatories as being specifically objected to, as well as that it is obvious that every one of the Company’s general objections cannot possibly apply to “each of the individual requests.”

3. Accordingly, Citizens assert emphatically that Sprint’s “General Objections” are wholly inapplicable to Citizens’ discovery requests and improperly asserted. The following are what the Company avers are appropriate discovery objections, all of which apply to every one of Citizens’ interrogatories, made pursuant to the Florida Rules of Civil Procedure:

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.

4. The Prehearing Officer, Commissioner Bradley, in his Order Establishing Procedure, No. PSC-03—0994-PCO-TL, instructed the parties regarding discovery, that “Any objection to . . . discovery requests shall be made within five business day of service of the discovery request.”

5. Citizens do not believe that that instruction envisioned a blanket listing of any and all objections available to a party in the event that some specific discovery request was made of that party to which one or more of those available objections could be claimed and argued.

6. Citizens have served not a single interrogatory to Sprint to which every one of these eleven “General Objections” could possibly apply. Therefore, these objections are wholly inappropriate and irrelevant to Citizens’ discovery requests and should accordingly be dispatched from consideration by this Commission.

7. After listing the above eleven "General Objections" to any and all of Citizens' discovery as each of the objections may or may not apply, Sprint does identify some specific objections to particular discovery requests, as required by the Florida Rules of Civil Procedure. These discovery requests, followed by the Company's objections, and then the Citizens' response to the objections, follow below.

8. Interrogatory No. 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.

SPECIFIC OBJECTION:

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 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.

**CITIZENS' RESPONSE:**

Sprint maintains that long distance rates and volumes are beyond the scope of discovery in this docket. However, this docket is about access prices that Sprint charges to its long distance competitors for long distance traffic. Citizen's request for Sprint's own long distance calling volumes is relevant to the issues in this docket. Sprint's reliance on section 364.164(3), Florida Statutes, is misplaced. Citizens assert that the discovery limitation addressed in that section pertains only to the rate adjustment filings identified in section 364.164(2), and further addressed in section 364.164(3) and section 364.164(7), Florida Statutes.

9. **Interrogatory No. 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.



**SPECIFIC OBJECTION:**

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.

**CITIZENS' RESPONSE:**

See Citizens' Response to Interrogatory Request No. 27, Above.

10. Interrogatory No. 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.

**SPECIFIC OBJECTION:**

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.

**CITIZENS' RESPONSE:**

See Citizens' Response to Interrogatory No. 27, above. Citizen's request for information relates to Sprint's obligation under Section 364.163(2) to reduce its long distance rates by the amount necessary to return the benefits of such reductions to residential and business customers. The Citizens and the Commission need to know

exactly how these reductions will be passed on to customers in order to determine whether there is any benefit whatsoever for the residential customers as required under Section 364.164(1)(a). These two statutes are inextricably linked to the filings of Sprint in this docket. Furthermore, Sprint's reliance on section 364.164(3), Florida Statutes, is misplaced. Citizens assert that the discovery limitation addressed in that section pertains only to the rate adjustment filings identified in section 364.164(2), and further addressed in section 364.164(3) and section 364.164(7), Florida Statutes.

11. Interrogatory No. 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.

SPECIFIC OBJECTION:

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.

**CITIZENS' RESPONSE:**

See OPC Response to Objections to Interrogatory No. 29.

12. Interrogatory No. 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. 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.

**SPECIFIC OBJECTION:**

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.

**OPC RESPONSE:**

See Citizens' Response to Interrogatory No. 27, above. Citizen's request for information relates to Sprint's obligation under Section 364.163(2) to reduce its long distance rates by the amount necessary to return the benefits of such reductions to residential and business customers. The Citizens and the Commission need to know exactly how these reductions will be passed on to customers in order to determine whether there is any benefit whatsoever for the residential customers as required under Section 364.164(1)(a). These two statutes are inextricably linked to the filings of Sprint in this docket.

13. Interrogatory No. 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.

SPECIFIC OBJECTION:

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. 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.

**OPC RESPONSE:**

See OPC Response to Objection to Interrogatory No. 31, above.

14. **Interrogatory No. 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.

**SPECIFIC OBJECTION:**

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.

**OPC RESPONSE:**

See OPC Response to Objection to Interrogatory No. 31, above.

15. Interrogatory No. 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.



**SPECIFIC OBJECTION:**

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(20), 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.

**OPC RESPONSE:**

See OPC Response to Objection to Interrogatory No. 31, above.

16. Interrogatory No. 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.

**SPECIFIC OBJECTION:**

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.

**OPC RESPONSE:**

OPC's interrogatory seeks information directly relating to the benefits that the Commission is required to consider in reaching a decision in this docket as specified in Section 364.164(1)(a). In addition, OPC seeks information that will support or abrogate the testimony of witness Felz, page 23, line 23 through page 27, line 1, as well as Section III of witness Gordon's testimony, entitled THE COMPANIES' PLANS WILL RESULT IN A "MORE ATTRACTIVE COMPETITIVE LOCAL EXCHANGE MARKET FOR THE BENEFIT OF RESIDENTIAL CUSTOMERS . . ."

17. **Interrogatory No. 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.

**SPECIFIC OBJECTION:**

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.

**OPC RESPONSE:**

See OPC Response to Objection to Interrogatory No. 31, above.

17. Interrogatory No. 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).

**SPECIFIC OBJECTION:**

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(20), 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.

**OPC RESPONSE:**

See OPC Response to Objection to Interrogatory No. 29, above.

Respectfully Submitted,

CHARLES J. BECK  
Interim Public Counsel  
Florida Bar No. 217821

A handwritten signature in black ink, appearing to read "H F. Rick Mann", written in a cursive style.

H F. Rick Mann  
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(850) 488-9330

Attorney for Florida's Citizens

DOCKET NO. 030868-TL

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail or hand-delivery to the following parties on this 22nd day of September, 2003.



H F. Mann

Beth Keating, Esquire  
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