

Richard A. Chapkis
Vice President -- General Counsel, Southeast Region
Legal Department

FLTC0007
201 North Franklin Street (33602)
Post Office Box 110
Tampa, Florida 33601-0110

Phone 813 483-1256
Fax 813 273-9825
richard_chapkis@verizon.com

September 23, 2003

Ms. Blanca S. Bayo, Director
Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 030867-TL
Petition of Verizon Florida Inc. to Reform Its Intrastate Network Access and Basic
Local Telecommunications Rates in Accordance with Florida Statutes, Section
364.164

Dear Ms. Bayo:

Please find enclosed for filing an original and one copy of Verizon Florida Inc.'s Notices of Service of Initial Objections to Staff's First Request for Production of Documents (Nos. 1-25) and First Set of Interrogatories (Nos. 1-41) in the above matter. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at 813-483-1256.

Sincerely,


Richard Chapkis

RC:tas
Enclosures



106 East College Avenue, Suite 810
Tallahassee, FL 32301

Phone 850 222 6300
Fax 850.222 2912

DOCUMENT NUMBER DATE
09117 SEP 23 8
FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Notices of Service and Initial Objections to Staff's First Request for Production of Documents (Nos. 1-25) and First Set of Interrogatories (Nos. 1-41) in Docket No. 030867-TL were sent via electronic mail and hand-delivery(*) or overnight delivery(**) on September 23, 2003 to:

Staff Counsel(*)
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Nancy White c/o Nancy Sims(**)
BellSouth Telecomm. Inc.
150 S. Monroe Street, Suite 400
Tallahassee, FL 32301-1556

Tracy Hatch(**)
AT&T
101 N. Monroe, Suite 700
Tallahassee, FL 32301

Michael Gross(**)
Florida Cable Telecomm. Assn.
246 East 6th Avenue
Tallahassee, FL 32303

Susan Masterton(**)
Charles Rehwinkel
Sprint-Florida
1313 Blairstone Road
MC FLTLHO0107
Tallahassee, FL 32301

Donna McNulty(**)
MCI WorldCom, Inc.
1203 Governors Square Blvd.
Suite 201
Tallahassee, FL 32301-2960

Charles J. Beck(*)
H. F. Mann
Office of Public Counsel
111 W. Madison Street, Room 812
Tallahassee, FL 32399-1400

John Fons(**)
Ausley & McMullen, P.A.
227 South Calhoun Street
Tallahassee, FL 32302

Michael B. Twomey(**)
AARP
8903 Crawfordsville Road
Tallahassee, FL 32305

Mark Cooper(**)
AARP
504 Highgate Terrace
Silver Spring, MD 20904


Richard Chapkis

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Verizon Florida Inc. to Reform)
Its Intrastate Network Access and Basic Local)
Telecommunications Rates in Accordance with)
Florida Statutes, Section 364.164)
_____)

Docket No. 030867-TL
Filed: September 23, 2003

**NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S INITIAL OBJECTIONS TO
STAFF'S FIRST SET OF INTERROGATORIES (NOS. 1-41)**

NOTICE IS HEREBY GIVEN that a true and correct copy of Verizon Florida Inc.'s Initial Objections to Staff's First Set of Interrogatories (Nos. 1-41) was sent via electronic mail and hand-delivery on September 23, 2003, to Beth Keating, Staff Counsel, Florida Public Service Counsel, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399-0850.

The original and one copy of this Notice were hand-delivered on September 23, 2003, to the Director, Division of the Commission Clerk and Administrative Services, at the Commission. Further service on other parties of record is as set forth on the Certificate of Service, appended hereto.

Respectfully submitted on September 23, 2003.

By: 
Richard A. Chapkis
201 N. Franklin Street, FLTC0717
P. O. Box 110
Tampa, FL 33601
Tel: 813-483-1256
Fax: 813-273-9825
e-mail: richard.chapkis@verizon.com

Attorney for Verizon Florida Inc.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Verizon Florida Inc. to Reform)
Its Intrastate Network Access and Basic Local)
Telecommunications Rates in Accordance with)
Florida Statutes, Section 364.164)
_____)

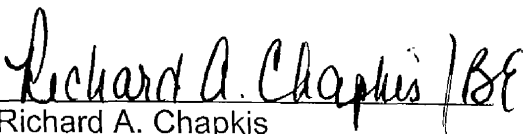
Docket No. 030867-TL
Filed: September 23, 2003

**NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S INITIAL OBJECTIONS TO
STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-25)**

NOTICE IS HEREBY GIVEN that a true and correct copy of Verizon Florida Inc.'s Initial Objections to Staff's First Request for Production of Documents (Nos. 1-25) was sent via electronic mail and hand-delivery on September 23, 2003, to Beth Keating, Staff Counsel, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee4, FL 32399-0850.

The original and one copy of this Notice were hand-delivered on September 23, 2003, to the Director, Division of the Commission Clerk and Administrative Services, at the Commission. Further service on other parties of record is as set forth on the Certificate of Service, appended hereto.

Respectfully submitted on September 23, 2003.

By: 
Richard A. Chapkis
201 N. Franklin Street, FLTC0717
P. O. Box 110
Tampa, FL 33601
Tel: 813-483-1256
Fax: 813-273-9825
e-mail: richard.chapkis@verizon.com

Attorney for Verizon Florida Inc.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Verizon Florida Inc. to Reform)
Its Intrastate Network Access and Basic Local)
Telecommunications Rates in Accordance with)
Florida Statutes, Section 364.164)
_____)

Docket No. 030867-TL
Filed: September 23, 2003

**VERIZON FLORIDA INC.'S INITIAL OBJECTIONS TO
STAFF'S FIRST SET OF INTERROGATORIES**

Verizon Florida Inc. (Verizon), pursuant to Florida Administrative Code Rule 28-106.206 and Rules 1.340 and 1.280 of the Florida Rules of Civil Procedure, files these initial objections to the Florida Public Service Commission Staff's (Staff) First Set of Interrogatories (First Set).

These objections are preliminary and made at this time to comply with the requirement set forth in Order No. PSC-03-0994-PCO-TL, issued by the Florida Public Service Commission (Commission) on September 4, 2003. Should additional grounds for objection be discovered as Verizon prepares its answers to the First Set, Verizon reserves the right to supplement, revise, or modify its objections at the time it serves its responses.

GENERAL OBJECTIONS

1. Verizon objects to each interrogatory to the extent that it seeks to impose an obligation on Verizon to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such interrogatory is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. Verizon objects to each interrogatory to the extent that it is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the

Commission. Verizon objects to each such interrogatory as being irrelevant, overly broad, unduly burdensome, and oppressive.

3. Verizon objects to each interrogatory to the extent that it requests information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. Verizon objects to each interrogatory to the extent that it is vague, ambiguous, overly broad, imprecise, or to the extent that it utilizes terms that are subject to multiple interpretations and are not properly defined or explained for purposes of this discovery. Any answers provided by Verizon in response to the First Set will be provided subject to, and without waiver of, the foregoing objection.

5. Verizon objects to each interrogatory to the extent that it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this proceeding. Verizon will attempt to state in its responses each instance where this objection applies.

6. Verizon objects to providing information to the extent that such information is already in the public record before the Commission.

7. Verizon objects to the First Set to the extent that it seeks to have Verizon create documents not in existence at the time of the request.

8. Verizon objects to each interrogatory to the extent that it seeks to impose obligations on Verizon that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

9. Verizon objects to each interrogatory to the extent that it seeks to impose obligations on Verizon that exceed the requirements of Florida Statutes, Section 364.164(3).

10. Verizon objects to each interrogatory to the extent that responding to it would be unduly burdensome, expensive, oppressive, or excessively time consuming.

11. Verizon objects to each interrogatory to the extent that it is not limited to any stated period of time and, therefore, is overly broad and unduly burdensome.

12. In light of the short period of time Verizon was afforded to respond to the First Set, discovery and the development of Verizon's position are necessarily ongoing, and Verizon's response may be subject to supplementation or further refinement. Verizon therefore reserves the right, at its discretion, to supplement or modify its response. However, Verizon does not assume an affirmative obligation to supplement its answers on an ongoing basis.

INITIAL SPECIFIC OBJECTIONS

In addition to the foregoing general objections that apply to all interrogatories in the First Set, Verizon raises the following initial specific objections to the following individual interrogatories in the First Set:

Interrogatory No. 19:

On page 24 of his direct testimony, lines 1-2, witness Fulp states that “[b]asic local residential rates are subsidized and receive substantial support.” Please provide a list of all Verizon services that subsidize basic local service rates.

Specific Objection to Interrogatory No. 19:

In addition to its General Objections, which are incorporated herein by reference, Verizon objects to this interrogatory on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this proceeding. Pursuant to Florida Statutes Section 364.164(1)(i), the Commission must consider whether Verizon's basic residential local telecommunications services receive support. Section 364.164(1) does not direct the Commission to consider which services support basic services. Moreover, Verizon objects to this interrogatory on the grounds that it seeks information precluded from discovery by the limitations imposed by Florida Statutes, Section 364.164(3). Even if the Commission broadly construes Section 364.164(3) to mean that discovery is limited to issues addressed in Verizon's Petition (which it should not), Verizon's Petition does not focus on the services that support basic services.

Interrogatory No. 20:

For each of the services listed in response to Interrogatory 19, please specify whether a customer can purchase the service from a provider other than Verizon, if the customer purchases basic local service from Verizon.

Specific Objection to Interrogatory No. 20:

In addition to its General Objections, which are incorporated herein by reference, Verizon objects to this interrogatory on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this proceeding. Pursuant to Florida Statutes Section 364.164(1)(i), the Commission must consider whether Verizon's basic residential local telecommunications services receive

support. Section 364.164(1) does not direct the Commission to consider which services support basic services. Moreover, Verizon objects to this interrogatory on the grounds that it seeks information precluded from discovery by the limitations imposed by Florida Statutes, Section 364.164(3). Even if the Commission broadly construes Section 364.164(3) to mean that discovery is limited to issues addressed in Verizon's Petition (which it should not), Verizon's Petition does not focus on the services that support basic services.

Interrogatory No. 25:

Referencing Table I of witness Gordon's direct testimony, at page 10, please provide the average billed charges for the combination of flat-rate residential basic service and central office features.

Specific Objection to Interrogatory No. 25:

In addition to its General Objections, which are incorporated herein by reference, Verizon objects to this interrogatory on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this proceeding. Pursuant to Florida Statutes Section 364.164(1)(i), the Commission must consider whether Verizon's basic residential local telecommunications services receive support. Average billed charges for central office features are not relevant to the rebalancing of basic local telecommunications rates in accordance with Section 364.164. Moreover, Verizon objects to this interrogatory on the grounds that it seeks information precluded from discovery by the limitations imposed by Florida Statutes, Section 364.164(3). Even if the Commission broadly construes Section 364.164(3) to mean that

discovery is limited to issues addressed in Verizon's Petition (which it should not), Verizon's Petition does not focus on "central office features."

Interrogatory No. 36:


Referring to Verizon witness Danner's direct testimony, page 21, lines 6-18, what are Verizon Florida's DSL take rates for December 2000, 2001, 2002, and June 2003?

Specific Objection to Interrogatory No. 36:

In addition to its General Objections, which are incorporated herein by reference, Verizon objects to this interrogatory on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this proceeding. Moreover, Verizon objects to this interrogatory on the grounds that it seeks information precluded from discovery by the limitations imposed by Florida Statutes, Section 364.164(1) and (3). Even if the Commission broadly construes Section 364.164(3) to mean that discovery is limited to issues addressed in Verizon's Petition (which it should not), Verizon's Petition does not focus on the information sought in this interrogatory. Finally, Verizon objects to this interrogatory because DSL services are regulated at the federal level.

Respectfully submitted on September 23, 2003.

By:


RICHARD A. CHAPKIS
201 North Franklin Street, FLTC0717
P. O. Box 110
Tampa, FL 33601
Tel: 813-483-1256
Fax: 813-273-9825
e-mail: richard.chapkis@verizon.com
Attorney for Verizon Florida Inc.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Verizon Florida Inc. to Reform)
Its Intrastate Network Access and Basic Local)
Telecommunications Rates in Accordance with)
Florida Statutes, Section 364.164)
_____)

Docket No. 030867-TL
Filed: September 23, 2003

**VERIZON FLORIDA INC.'S INITIAL OBJECTIONS TO
STAFF'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS**

Verizon Florida Inc. (Verizon), pursuant to Florida Administrative Code Rule 28-106.206 and Rules 1.340 and 1.280 of the Florida Rules of Civil Procedure, files these initial objections to the Florida Public Service Commission Staff's (Staff) First Set of Requests for Production of Documents (First Set).

These objections are preliminary and made at this time to comply with the requirement set forth in Order No. PSC-03-0994-PCO-TL, issued by the Florida Public Service Commission (Commission) on September 4, 2003. Should additional grounds for objection be discovered as Verizon prepares its answers to the First Set, Verizon reserves the right to supplement, revise, or modify its objections at the time it serves its responses.

GENERAL OBJECTIONS

1. Verizon objects to each request to the extent that it seeks to impose an obligation on Verizon to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such request is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. Verizon objects to each request to the extent that it is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the

Commission. Verizon objects to each such request as being irrelevant, overly broad, unduly burdensome, and oppressive.

3. Verizon objects to each request to the extent that it seeks documents that are exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. Verizon objects to each request to the extent that it is vague, ambiguous, overly broad, imprecise, or to the extent that it utilizes terms that are subject to multiple interpretations and are not properly defined or explained for purposes of this discovery. Any documents provided by Verizon in response to the First Set will be provided subject to, and without waiver of, the foregoing objection.

5. Verizon objects to each request to the extent that it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this proceeding. Verizon will attempt to state in its responses each instance where this objection applies.

6. Verizon objects to providing documents to the extent that they are already in the public record before the Commission.

7. Verizon objects to the First Set to the extent that it seeks to have Verizon create documents not in existence at the time of the request.

8. Verizon objects to each request to the extent that it seeks to impose obligations on Verizon that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

9. Verizon objects to each request to the extent that it seeks to impose obligations on Verizon that exceed the requirements of Florida Statutes, Section 364.164(3).

10. Verizon objects to each request to the extent that responding to it would be unduly burdensome, expensive, oppressive, or excessively time consuming.

11. Verizon objects to each request to the extent that it is not limited to any stated period of time and, therefore, is overly broad and unduly burdensome.

12. In light of the short period of time Verizon was afforded to respond to the First Set, discovery and the development of Verizon's position are necessarily ongoing, and Verizon's response may be subject to supplementation or further refinement. Verizon therefore reserves the right, at its discretion, to supplement or modify its response. However, Verizon does not assume an affirmative obligation to supplement its answers on an ongoing basis.

13. Verizon is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, Verizon 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. Verizon will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the First Set purports to require more, Verizon objects on the grounds that compliance would impose an undue burden or expense.

INITIAL SPECIFIC OBJECTIONS

In addition to the foregoing general objections that apply to all requests in the First Set, Verizon raises the following initial specific objections to the following individual requests in the First Set:

Request No. 19:


Please provide all data, papers, and documentation in support of your response to Interrogatory #36.

Specific Objection to Request No. 19:

In addition to its General Objections, which are incorporated herein by reference, Verizon objects to this request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this proceeding. Moreover, Verizon objects to this request on the grounds that it seeks information precluded from discovery by the limitations imposed by Florida Statutes, Section 364.164(1) and (3). Even if the Commission broadly construes Section 364.164(3) to mean that discovery is limited to issues addressed in Verizon's Petition (which it should not), Verizon's Petition does not focus on the information sought in this

request. Finally, Verizon objects to this request because DSL services are regulated at the federal level.

Respectfully submitted on September 23, 2003.

By: 
RICHARD A. CHAPKIS
201 North Franklin Street, FLTC0717
P. O. Box 110
Tampa, FL 33601
Tel: 813-483-1256
Fax: 813-273-9825
e-mail: richard.chapkis@verizon.com

Attorney for Verizon Florida Inc.