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WILMER, CUTLER & PICKERING

2445 M STREET, N.W.
WASHINGTON, DC 20037-1420

TELEPHONE (202) 663-6000
FACSIMILE (202) 663-6363
WWW.WILMER.COM

September 22, 2003

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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COMMISSION
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Re: **Docket Nos. 981834-TP and 990321-TP (Generic Collocation)**

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of Verizon Florida Inc.'s Initial Objections to Staff's Twelfth Set of Interrogatories and Eleventh Request for Production of Documents, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,


Daniel McCuaig

cc: All Parties of Record
Charles Schubart

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CERTIFICATE OF SERVICE
Docket No. 981834-TP and 990321-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail this 22nd day of September, 2003 (with service via First Class U.S. Mail or Facsimile to follow) to the following:

Beth Keating, Staff Counsel
C. Lee Fordham, Staff Counsel
Adam Teitzman, Staff Counsel
Andrew Maurey; Betty Gardner
Cheryl Bulecza-Banks
David Dowds
Jackie Schindler
Jason-Earl Brown
Laura King; Bob Casey
Pat Lee; Stephanie Cater
Paul Vickery
Pete Lester; Zoryana Ring
Sally Simmons
Shevie Brown
Todd Brown
Victor Mckay
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6212
Fax. No. (850) 413-6250
bkeating@psc.state.fl.us
cfordham@psc.state.fl.us
ateitzma@psc.state.fl.us
amaurey@psc.state.fl.us
bgardner@psc.state.fl.us
cbulecza@psc.state.fl.us
david.dowds@psc.state.fl.us
jschindl @psc.state.fl.us
jebrown@psc.state.fl.us
lking@psc.state.fl.us; bcasey@psc.state.fl.us
plee@psc.state.fl.us; scater@psc.state.fl.us
pvickery@psc.state.fl.us
plester@psc.state.fl.us; zring@psc.state.fl.us
sasimmon@psc.state.fl.us
sbbrown@psc.state.fl.us
tbrown@psc.state.fl.us
vmckay@psc.state.fl.us

Terry Monroe
Vice President, State Affairs
Competitive Telecomm. Assoc.
1900 M Street, N.W. Suite 800
Washington, D.C. 20036
Tel. No. (202) 296-6650
Fax. No. (202) 296-7585
tmonroe@comptel.org

Marilyn H. Ash
MGC Communications, Inc.
3301 North Buffalo Drive
Las Vegas, Nevada 89129
Tel. No. (702) 310-8461
Fax. No. (702) 310-5689
mash@mgccom.com

J. Phillip Carver
Senior Attorney
Nancy Sims Nancy
White Stan Greer
BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
Tel. No. (404) 335-0710
J.Carver@bellsouth.com
nancy.sims@bellsouth.com
nancy.white@bellsouth.com
stan.greer@bellsouth.com

Peter M. Dunbar, Esq. Pennington,
Moore, Wilkinson & Dunbar, P.A.
Post Office Box 10095 Tallahassee,
Florida 32302
Tel. No. (850) 222-3533
Fax. No. (850) 222-2126
pete@penningtonlawfirm.com

Jonathan Audu
Paul Turner
Supra Telecommunications
& Information Systems, Inc.
2620 S.W. 27th Avenue
Miami, FL 33133
Tel. No. (305) 531-5286
Fax. No. (305) 476-4282
jonathan.audu@stis.com
pturner@stis.com

Florida Digital Network, Inc.
Matthew Feil, Esq.
390 North Orange Avenue
Suite 2000
Orlando, FL 32801
Tel. No. (407) 835-0460
Fax. No. (407) 835-0309
mfeil@floridadigital.net

Rodney L. Joyce
Shook, Hardy & Bacon, L.L.P.
600 14th Street, N.W.
Suite 800
Washington, DC 20005-2004
Tel. No. (202) 639-5602
Fax. No. (202) 783-4211
Counsel for Network Access Solutions
rjoyce@shb.com

Michael A. Gross
VP Reg. Affairs & Reg. Counsel
Florida Cable Telecomm. Assoc.
246 East 6th Avenue, Suite 100
Tallahassee, FL 32303
Tel. No. (850) 681-1990
Fax. No. (850) 681-9676
mgross@fcta.com

TCG South Florida
c/o Rutledge Law Firm
Kenneth Hoffman
P.O. Box 551
Tallahassee, FL 32302-0551
Tel. No. (850) 681-6788
Fax. No. (850) 681-6515
ken@reuphlaw.com

Laura L. Gallagher
Laura L. Gallagher, P.A.
101 E. College Avenue Suite 302
Tallahassee, FL 32301
Tel. No. (850) 224-2211
Fax. No. (850) 561-3611
Represents MediaOne
gallagherl@gtlaw.com

Susan S. Masterton
Charles J. Rehwinkel
Sprint Comm. Co. LLP
P.O. Box 2214
MC: FLTLHOO107
Tallahassee, FL 32316-2214
Tel. No. (850) 847-0244
Fax. No. (850) 878-0777
susan.masterton@mail.sprint.com

Sprint-Florida, Incorporated
Mr. F. B. (Ben) Poag
P.O. Box 2214 (MC FLTLHOO107)
Tallahassee, FL 32316-2214
Tel: 850-599-1027
Fax: 407-814-5700
Ben.Poag@mail.sprint.com

William H. Weber, Senior Counsel
Gene Watkins
Covad Communications
1230 Peachtree Street, N.E.
19th Floor
Atlanta, Georgia 30309
Tel. No. (404) 942-3494
Fax. No. (404) 942-3495
wweber@covad.com
g Watkins@covad.com

J. Jeffry Wahlen
Ausley & McMullen
P.O. Box 391
Tallahassee, FL 32302
jwahlen@ausley.com

Network Access Solutions Corp.
Mr. Don Sussman
Three Dulles Tech Center
13650 Dulles Technology Drive
Herndon, VA 20171-4602
Tel. No.: (703) 793-5102
Fax. No. (208) 445-7278
dsussman@nas-corp.com

Ms. Nanette S. Edwards
4092 South Memorial Parkway
Huntsville, AL 35802-4343
Tel. No. (256) 382-3856
Fax. No. (256) 382-3936
nedwards@itcdeltacom.com

Ms. Lisa A. Riley
Michael Henry
Roger Fredrickson
1200 Peachtree Street, N.E.
Suite 8066
Atlanta, GA 30309-3523
Tel. No. (404) 810-7812
Fax. No. (404) 877-7646
lisariley@att.com
michaeljhenry@att.com
rfredrickson@att.com

Tracy Hatch
AT&T
101 North Monroe Street, Suite 700
Tallahassee, FL 32301-1549
Tel. No. (850) 425-6360
thatch@att.com

FPTA, Inc.
Mr. David Tobin Tobin & Reyes
7251 West Palmetto Park Road
#205
Boca Raton, FL 33433-3487
Tel. No. (561) 620-0656
Fax. No. (561) 620-0657
dst@tobinreyes.com

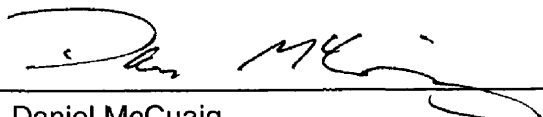
John McLaughlin
KMC Telecom. Inc.
Mr. John D. McLaughlin, Jr.
1755 North Brown Road
Lawrenceville, GA 30043
Tel. No. (678) 985-6261
Fax. No. (678) 985-6213
jmclau@kmctelecom.com

Joseph A. McGlothlin
Vicki Gordon Kaufman
Tim Perry
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman, Arnold,
& Steen, P.A.
117 South Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 222-2525
Fax. No. (850) 222-5606
Attys. for FCCA
Atty. for Network Telephone Corp.
Atty. for BlueStar
jmcglothlin@mac-law.com
vkaufman@mac-law.com
tperry@mac-law.com

Andrew Isar
Telecomm. Resellers Assoc.
7901 Skansie Avenue
Suite 240
Gig Harbor, WA 98335
Tel. No. (253) 851-6700
Fax. No. (253) 851-6474
aisar@millerisar.com

Floyd R. Self, Esq.
Messer, Capareello & Self, P.A.
Post Office Box 1876
Tallahassee, FL 32302-1876
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Represents AT&T
fself@lawfla.com

Richard D. Melson
Hopping Green Sams & Smith, P.A.
Post Office 6526
123 South Calhoun Street
Tallahassee, FL 32314
Tel. No. (850) 222-7500
Fax. No. (850) 224-8551
Atty. For ACI
rmelson@hgslaw.com


Daniel McCuaig

the above-referenced Interrogatories and Requests, Verizon FL reserves the right to supplement, revise, or modify its objections at the time it serves its responses.

GENERAL OBJECTIONS

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

2. Verizon FL objects to each Production Request and 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 FL objects to each such Interrogatory and Request as being irrelevant, overly broad, unduly burdensome, and oppressive.

3. Verizon FL objects to each Production Request and 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 FL objects to each Production Request and 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 FL in response to these Interrogatories and Production Requests will be provided subject to, and without waiver of, the foregoing objection.

5. Verizon FL objects to each Production Request and 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 action. Verizon FL will attempt to note in its responses each instance where this objection applies.

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

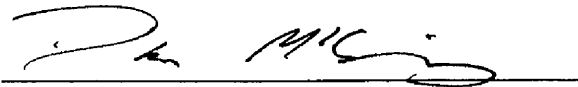
7. Verizon FL objects to each Production Request and Interrogatory to the extent that it seeks to impose obligations on Verizon FL that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

8. Verizon FL objects to each Production Request and Interrogatory to the extent that responding to it would be unduly burdensome, expensive, oppressive, or excessively time consuming.

9. Verizon FL objects to each Production Request and Interrogatory to the extent that it is not limited to any stated period of time and, therefore, is overly broad and unduly burdensome.

10. 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 FL will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the Production Requests or Interrogatories purport to require more, Verizon FL objects on the grounds that compliance would impose an undue burden or expense.

Respectfully submitted,



Richard A. Chapkis
Verizon FL Inc.
201 N. Franklin Street
FLTC0717
P.O. Box 110
Tampa, Florida 33601
(813) 483-1256

Catherine Kane Ronis
Daniel McCuaig
Wilmer, Cutler & Pickering
2445 M Street, NW
Washington, DC 20037-1420
(202) 663-6000

Dated: September 22, 2003

Attorneys for Verizon Florida Inc.