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September 25, 2003

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

Re: Docket No. 981834-TP & 990321-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint are the original and 15 copies of Sprint-Florida, Incorporated's ("Sprint") General Objections to Dieca Communications, Inc. d/b/a Covad Communication Company's Second Set of Interrogatories (Nos. 6-24) and Second Request for Production of Documents (No. 2)

Copies are being served on the parties in this docket via electronic and US mail.

Please acknowledge receipt of this filing by stamping and initialing a copy of this letter and returning same to the courier. If you have any questions, please do not hesitate to call me at 850/599-1560.

Sincerely,

Susan S. Masterton

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Enclosure

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**CERTIFICATE OF SERVICE
DOCKET NO. 981834-TP & 990321-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail & U.S. mail this 16th day of September, 2003 to the following:

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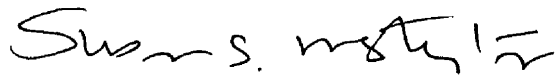
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A handwritten signature in cursive script that reads "Susan S. Masterton". The signature is written in black ink and is positioned above a horizontal line.

Susan S. Masterton

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for
Commission action to support local
competition in BellSouth
Telecommunications, Inc.'s service territory.

DOCKET NO. 981834-TP

In re: Petition of ACI Corp. d/b/a Accelerated
Connections, Inc. for generic investigation to
ensure that BellSouth Telecommunications,
Inc., Sprint-Florida, Incorporated, and GTE
Florida Incorporated comply with obligation to
provide alternative local exchange carriers
with flexible, timely, and cost-efficient
physical collocation.

DOCKET NO. 990321-TP

Filed: September 25, 2003

**SPRINT -FLORIDA, INCORPORATED'S GENERAL OBJECTIONS TO
DIECA COMMUNICATIONS, INC. D/B/A COVAD COMMUNICATION COMPANY'S
SECOND SET OF INTERROGATORIES (Nos. 6-24) AND SECOND REQUEST FOR
PRODUCTION OF DOCUMENTS (No. 2)**

Sprint-Florida, Incorporated ("Sprint"), pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.340, 1.350 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following Objections to Dieca Communications, Inc. d/b/a Covad Communications Company's ("Covad's") Second Set of Interrogatories (Nos. 6-24) and Second Request for Production of Documents (No. 2).

INTRODUCTION

The objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the ten-day requirement set forth in Order No. PSC-02-1513-PCO-TP ("Procedural Order") issued by the Florida Public Service Commission ("Commission") in the above-referenced docket. Should additional grounds for objection be discovered as Sprint prepares its responses to the above-referenced requests, Sprint reserves the right to supplement,

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revise, or modify its objections at the time that it serves its responses on Covad. Moreover, should Sprint determine that a Protective Order is necessary with respect to any of the material requested by Covad, Sprint reserves the right to file a motion with the Commission seeking such an order at the time that it serves its answers and responses on Covad.

GENERAL OBJECTIONS

Sprint makes the following General Objections to Covad's Second Set of Interrogatories (Nos. 6-24) ("Second IRR") and Second Request for Production of Documents (No. 2) ("Second POD"). These general objections apply to each of the individual requests and interrogatories in the Second IRR and Second POD, respectively, and will be incorporated by reference into Sprint's answers when they are served on Covad.

1. Sprint objects to the requests to the extent that such requests 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 requests are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. Sprint has interpreted Covad's requests to apply to Sprint's regulated intrastate operations in Florida and will limit its responses accordingly. To the extent that any request is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission, Sprint objects to such request to produce as irrelevant, overly broad, unduly burdensome, and oppressive.

3. Sprint objects to each and every request and instruction to the extent that such request or instruction calls for information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. Sprint objects to each and every request insofar as the request is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these requests. Any responses provided by Sprint to Covad's requests will be provided subject to, and without waiver of, the foregoing objection.

5. Sprint objects to each and every request insofar as the request 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.

6. Sprint objects to Covad's discovery requests, instructions and definitions, insofar as they seek to impose obligation on Sprint that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

7. Sprint objects to providing information to the extent that such information is already in the public record before the Commission, or elsewhere.

8. Sprint objects to each and every request, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. Sprint objects to each and every request to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that Covad's requests proprietary confidential business information which is not subject to the "trade secrets" privilege, Sprint will make such information available to counsel for Covad pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

10. 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 will be provided in response to these discovery requests. Rather, Sprint's responses will provide, subject to any applicable objections, all of the information obtained by Sprint after a reasonable and diligent search conducted in connection with these requests. Sprint shall conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the discovery requests purport to require more, Sprint objects on the grounds that compliance would impose an undue burden or expense. To the extent that Covad's requests herein documents that have previously been produced to other parties in response to previous discovery, then without limiting any of the foregoing objections, Sprint incorporates herein by reference its objections to that previous discovery.

SPECIFIC OBJECTIONS SECOND IRR

INTERROGATORY NO. 13. Provide the total capacity in amperes on an aggregate basis for all Sprint central offices in Florida today.

OBJECTION: In addition to its general objections set forth above, Sprint objects to this Interrogatory because it seeks information relating to the technical power issues that were a part of the first phase of the proceeding and is therefore irrelevant. The deadline for discovery relating to the technical issues has long since passed and, in fact, the hearing has been held and briefs filed and the record for those issues is closed. This interrogatory is irrelevant to the cost issues that are within the proper scope of the second phase (Issues 9 & 10) of this proceeding. In addition to its objection based on irrelevancy, Sprint objects to this Interrogatory because it is unduly burdensome, expensive, oppressive, or excessively time consuming as written. The information requested is not readily available to Sprint. It would take Sprint at least a month and

cost several thousands of dollars to research, collect and assemble the information requested in Interrogatories 13-24 for Sprint's 100+ central offices in Florida.

INTERROGATORY NO. 14. Of the total capacity in amperes provided in response to Interrogatory No. 13, what percentage of that capacity is currently ordered available capacity by CLECs who are collocated with Sprint?

OBJECTION: In addition to its general objections set forth above, Sprint objects to this Interrogatory because it seeks information relating to the technical power issues that were a part of the first phase of the proceeding and is therefore irrelevant. The deadline for discovery relating to the technical issues has long since passed and, in fact, the hearing has been held and briefs filed and the record for those issues is closed. This interrogatory is irrelevant to the cost issues that are within the proper scope of the second phase (Issues 9 &10) of this proceeding. In addition to its objection based on irrelevancy, Sprint objects to this Interrogatory because it is unduly burdensome, expensive, oppressive, or excessively time consuming as written. The information requested is not readily available to Sprint. It would take Sprint at least a month and cost several thousands of dollars to research, collect and assemble the information requested in Interrogatories 13-24 for Sprint's 100+ central offices in Florida.

INTERROGATORY NO. 15. Of the total capacity in amperes in response to Interrogatory No. 13, how much of that total capacity in amperes is currently unused or spare capacity?

OBJECTION: In addition to its general objections set forth above, Sprint objects to this Interrogatory because it seeks information relating to the technical power issues that were a part of the first phase of the proceeding and is therefore irrelevant. The deadline for discovery relating to the technical issues has long since passed and, in fact, the hearing has been held and briefs filed and the record for those issues is closed. This interrogatory is irrelevant to the cost issues that are within the proper scope of the second phase (Issues 9 &10) of this proceeding. In addition to its objection based on irrelevancy, Sprint objects to this Interrogatory because it is

unduly burdensome, expensive, oppressive, or excessively time consuming as written. The information requested is not readily available to Sprint. It would take Sprint at least a month and cost several thousands of dollars to research, collect and assemble the information requested in Interrogatories 13-24 for Sprint's 100+ central offices in Florida.

INTERROGATORY NO. 16. Provide the total capacity in amperes that has been added as augments or new construction on an aggregate basis for all Sprint central offices in Florida since January 1, 1996.

OBJECTION: In addition to its general objections set forth above, Sprint objects to this Interrogatory because it seeks information relating to the technical power issues that were a part of the first phase of the proceeding and is therefore irrelevant. The deadline for discovery relating to the technical issues has long since passed and, in fact, the hearing has been held and briefs filed and the record for those issues is closed. This interrogatory is irrelevant to the cost issues that are within the proper scope of the second phase (Issues 9 &10) of this proceeding. In addition to its objection based on irrelevancy, Sprint objects to this Interrogatory because it is unduly burdensome, expensive, oppressive, or excessively time consuming as written. The information requested is not readily available to Sprint. It would take Sprint at least a month and cost several thousands of dollars to research, collect and assemble the information requested in Interrogatories 13-24 for Sprint's 100+ central offices in Florida.

INTERROGATORY NO. 17. Of the total capacity in amperes provided in response to Interrogatory No. 16, what percentage of that capacity is currently ordered available capacity by CLECs who are collocated with Sprint?

OBJECTION: In addition to its general objections set forth above, Sprint objects to this Interrogatory because it seeks information relating to the technical power issues that were a part of the first phase of the proceeding and is therefore irrelevant. The deadline for discovery relating to the technical issues has long since passed and, in fact, the hearing has been held and

briefs filed and the record for those issues is closed. This interrogatory is irrelevant to the cost issues that are within the proper scope of the second phase (Issues 9 &10) of this proceeding. In addition to its objection based on irrelevancy, Sprint objects to this Interrogatory because it is unduly burdensome, expensive, oppressive, or excessively time consuming as written. The information requested is not readily available to Sprint. It would take Sprint at least a month and cost several thousands of dollars to research, collect and assemble the information requested in Interrogatories 13-24 for Sprint's 100+ central offices in Florida.

INTERROGATORY NO. 18. Of the total capacity in amperes identified in response to Interrogatory No. 16, how much of that total capacity in amperes is currently unused or spare capacity?

OBJECTION: In addition to its general objections set forth above, Sprint objects to this Interrogatory because it seeks information relating to the technical power issues that were a part of the first phase of the proceeding and is therefore irrelevant. The deadline for discovery relating to the technical issues has long since passed and, in fact, the hearing has been held and briefs filed and the record for those issues is closed. This interrogatory is irrelevant to the cost issues that are within the proper scope of the second phase (Issues 9 &10) of this proceeding. In addition to its objection based on irrelevancy, Sprint objects to this Interrogatory because it is unduly burdensome, expensive, oppressive, or excessively time consuming as written. The information requested is not readily available to Sprint. It would take Sprint at least a month and cost several thousands of dollars to research, collect and assemble the information requested in Interrogatories 13-24 for Sprint's 100+ central offices in Florida.

INTERROGATORY NO. 19. For each Sprint central office in Florida, provide the current power capacity in amperes.

OBJECTION: In addition to its general objections set forth above, Sprint objects to this Interrogatory because it seeks information relating to the technical power issues that were a part

of the first phase of the proceeding and is therefore irrelevant. The deadline for discovery relating to the technical issues has long since passed and, in fact, the hearing has been held and briefs filed and the record for those issues is closed. This interrogatory is irrelevant to the cost issues that are within the proper scope of the second phase (Issues 9 &10) of this proceeding. In addition to its objection based on irrelevancy, Sprint objects to this Interrogatory because it is unduly burdensome, expensive, oppressive, or excessively time consuming as written. The information requested is not readily available to Sprint. It would take Sprint at least a month and cost several thousands of dollars to research, collect and assemble the information requested in Interrogatories 13-24 for Sprint's 100+ central offices in Florida.

INTERROGATORY NO. 20. For each Sprint central office in Florida, of the capacity in amperes per central office provided in response to Interrogatory No. 19, what percentage of that capacity has been ordered by CLECs who are collocated with Sprint?

OBJECTION: In addition to its general objections set forth above, Sprint objects to this Interrogatory because it seeks information relating to the technical power issues that were a part of the first phase of the proceeding and is therefore irrelevant. The deadline for discovery relating to the technical issues has long since passed and, in fact, the hearing has been held and briefs filed and the record for those issues is closed. This interrogatory is irrelevant to the cost issues that are within the proper scope of the second phase (Issues 9 &10) of this proceeding. In addition to its objection based on irrelevancy, Sprint objects to this Interrogatory because it is unduly burdensome, expensive, oppressive, or excessively time consuming as written. The information requested is not readily available to Sprint. It would take Sprint at least a month and cost several thousands of dollars to research, collect and assemble the information requested in Interrogatories 13-24 for Sprint's 100+ central offices in Florida.

INTERROGATORY NO. 21. For each Sprint central office in Florida, of the total capacity in amperes identified in response to Interrogatory No. 19, how much of that total capacity in amperes is currently unused or spare capacity?

OBJECTION: In addition to its general objections set forth above, Sprint objects to this Interrogatory because it seeks information relating to the technical power issues that were a part of the first phase of the proceeding and is therefore irrelevant. The deadline for discovery relating to the technical issues has long since passed and, in fact, the hearing has been held and briefs filed and the record for those issues is closed. This interrogatory is irrelevant to the cost issues that are within the proper scope of the second phase (Issues 9 &10) of this proceeding. In addition to its objection based on irrelevancy, Sprint objects to this Interrogatory because it is unduly burdensome, expensive, oppressive, or excessively time consuming as written. The information requested is not readily available to Sprint. It would take Sprint at least a month and cost several thousands of dollars to research, collect and assemble the information requested in Interrogatories 13-24 for Sprint's 100+ central offices in Florida.

INTERROGATORY NO. 22. For each Sprint central office in Florida, provide the total capacity in amperes that has been added as augments or new construction in Florida since January 1, 1996.

OBJECTION: In addition to its general objections set forth above, Sprint objects to this Interrogatory because it seeks information relating to the technical power issues that were a part of the first phase of the proceeding and is therefore irrelevant. The deadline for discovery relating to the technical issues has long since passed and, in fact, the hearing has been held and briefs filed and the record for those issues is closed. This interrogatory is irrelevant to the cost issues that are within the proper scope of the second phase (Issues 9 &10) of this proceeding. In addition to its objection based on irrelevancy, Sprint objects to this Interrogatory because it is unduly burdensome, expensive, oppressive, or excessively time consuming as written. The

information requested is not readily available to Sprint. It would take Sprint at least a month and cost several thousands of dollars to research, collect and assemble the information requested in Interrogatories 13-24 for Sprint's 100+ central offices in Florida.

INTERROGATORY NO. 23. For each Sprint central office in Florida, of the capacity in amperes per central office provided in response to Interrogatory No. 22, what percentage of that capacity has been ordered by CLECs who are collocated with Sprint?

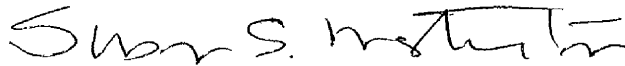
OBJECTION: In addition to its general objections set forth above, Sprint objects to this Interrogatory because it seeks information relating to the technical power issues that were a part of the first phase of the proceeding and is therefore irrelevant. The deadline for discovery relating to the technical issues has long since passed and, in fact, the hearing has been held and briefs filed and the record for those issues is closed. This interrogatory is irrelevant to the cost issues that are within the proper scope of the second phase (Issues 9 &10) of this proceeding. In addition to its objection based on irrelevancy, Sprint objects to this Interrogatory because it is unduly burdensome, expensive, oppressive, or excessively time consuming as written. The information requested is not readily available to Sprint. It would take Sprint at least a month and cost several thousands of dollars to research, collect and assemble the information requested in Interrogatories 13-24 for Sprint's 100+ central offices in Florida.

INTERROGATORY NO. 24. For each Sprint central office in Florida, of the total capacity in amperes identified in response to Interrogatory No. 22, how much of that total capacity is currently unused or spare capacity.

OBJECTION: In addition to its general objections set forth above, Sprint objects to this Interrogatory because it seeks information relating to the technical power issues that were a part of the first phase of the proceeding and is therefore irrelevant. The deadline for discovery relating to the technical issues has long since passed and, in fact, the hearing has been held and briefs filed and the record for those issues is closed. This interrogatory is irrelevant to the cost

issues that are within the proper scope of the second phase (Issues 9 &10) of this proceeding. In addition to its objection based on irrelevancy, Sprint objects to this Interrogatory because it is unduly burdensome, expensive, oppressive, or excessively time consuming as written. The information requested is not readily available to Sprint. It would take Sprint at least a month and cost several thousands of dollars to research, collect and assemble the information requested in Interrogatories 13-24 for Sprint's 100+ central offices in Florida.

DATED this 25th day of September 2003.



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