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September 30, 2003

BY HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of the Commission
Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
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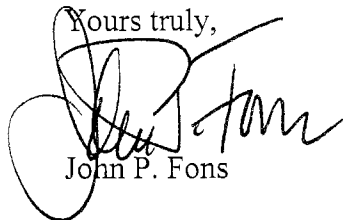
Re: Docket No. 030868-TL

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and fifteen (15) copies of Sprint-Florida, Inc.'s Response in Opposition to Citizens' Second Motion to Compel Answers to Interrogatories from Sprint-Florida, Inc.

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

09372 SEP 30 8

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 30, 2003

**SPRINT-FLORIDA, INCORPORATED'S RESPONSE IN OPPOSITION
TO CITIZENS' SECOND MOTION TO COMPEL ANSWERS
TO INTERROGATORIES FROM SPRINT-FLORIDA, INC.**

Sprint-Florida, Incorporated ("Sprint"), pursuant to Rules 28-106.204 and 28-106.206, Florida Administrative Code, and Rules 1.280 through 1.400, Florida Rules of Civil Procedures, responds in opposition ("Response") to Citizens' Second Motion to Compel Answers to Interrogatories from Sprint-Florida, Inc. ("Motion to Compel"), stating as follows:

1. On September 5, 2003, Citizens served their Second Set of Interrogatories on Sprint ("Citizens' 2nd Set"). Thereafter, on September 12, 2003, which is within the 5-business-day timeframe established by the Commission's Order Establishing Procedure and Consolidating Dockets for Hearing ("Procedural Order" - Order No. 03-0994-PCO-TL, issued September 4, 2003), Sprint filed its Objections to Citizens' 2nd Set ("Objections") in which Sprint made it clear that "[t]he objections stated herein are preliminary in nature and are made at this time to comply with the 5-business-day requirement set forth in Order No. PSC-03-0994-TL, issued September 4, 2003, at pages 3 and 4." Objections at p. 1. Within its Objections, Sprint provided both General Objections and Specific Objections. The General Objections went to all of the Interrogatories, while the Specific Objections went to those interrogatories which Sprint, at the time the objections were made, ascertained were specifically objectionable.

2. On September 22, 2003 - which is the day Sprint's Responses to Citizens' 2nd Set were due to be served on Citizens - Citizens filed and served its Motion to Compel. In their Motion to Compel, Citizens both attack Sprint's General Objections and challenge Sprint's Specific Objections. This Response addresses Citizens' misguided attack on Sprint's General Objections and Citizens' unpersuasive challenges to Sprint's Specific Objections.

I. General Objections

3. Citizens claim that Sprint's General Objections are "wholly inapplicable to Citizens' interrogatories and improperly asserted." Motion to Compel at ¶ 3. After listing each of Sprint's General Objections, Citizens contend that they "do not believe that that instruction (referring to the Procedural Order) envisioned a blanket listing of any and all objections available to a party . . ." Motion to Compel at ¶ 5. Additionally, Citizens contend that they "have served not a single interrogatory to Sprint to which every one of these eleven 'General Objections' could possibly apply." Motion to Compel at ¶ 6. Citizens conclude their attack on Sprint's General Objections by concluding that "these objections are wholly inappropriate and irrelevant to Citizens' discovery requests and should be dispatched accordingly." Motion to Compel at ¶ 6 (emphasis added). Sprint, while being uncertain as to what Citizens' request to "dispatch" Sprint's General Objection means in terms of Citizens' Motion to Compel, Sprint is certain that its General Objections are appropriate and relevant to Citizens' discovery requests.

4. The discovery procedures under which the parties are operating in this proceeding, although appropriate because of the tight timeframes imposed by Section 364.164(1), Florida Statutes, are, nonetheless, different from the discovery procedures reflected in Rule 28-106.206, Florida Administrative Code, which Rule requires reference to Rules 1.280 through 1.400, Florida Rules of Civil Procedure. Although Rule 1.340(a), Florida Rules of Civil Procedure, permits the

court to "allow for a shorter or longer time" to respond to or object to interrogatories, that Rule does not contemplate different deadlines for objecting to the discovery and for responding to the discovery. Because the Procedural Order imposes an extraordinary requirement on the party to whom discovery is directed to object to discovery prior to responding to the discovery, and in only 5 business-days after receipt of the discovery, there is the potential that the responding party will not know for certain until the date a discovery response is due that the request is objectionable and why. Consequently, it is totally appropriate for a party to raise General Objections as a preliminary matter in order to protect that party's rights to object in lieu of responding if conditions warrant. Otherwise, the party to whom discovery is directed runs the risk of being accused of waiving his or her objection for failure to have raised it in the 5-business-day timeframe.

5. In addition to providing the "safety net," described above, Sprint's General Objections also serve to address the types of discovery requests that are generally improper and objectionable. Rather than repeating the objection for each discovery request, providing general objections is more efficient, especially where the timeframes for objecting and responding are shortened as they are here. In fact, the parties to Commission proceedings have for years been using General Objections in just such a manner, and General Objections have become a matter of acceptable practice before the Commission.

6. As noted previously, Citizens filed their Motion to Compel prior to receiving Sprint's Responses to Citizens' 2nd Set. Had Citizens been less quick to file their Motion to Compel, Citizens would have seen just how efficiently this discovery practice actually works. In fact, as will be demonstrated below, many of the preliminary General Objections, while still of substantial merit, did not prevent Sprint from answering the interrogatories. The object of the

General Objections is not to use them as a mechanism for not responding to discovery requests when no specific objections are identified. Nor has Sprint used them in that manner here.

II. Specific Objections

7. Citizens seek to compel Sprint to provide an answer in response to Citizens' Interrogatory No. 27, which states:

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.

Sprint objected on the grounds that the interrogatory:

- a. seeks discovery of matters that are beyond the scope of issues to be considered by the Commission in this proceeding;
- b. seeks discovery related to end-user long distance services, but end-user long distance services are not a subject of Sprint-Florida's Petition;
- c. seeks discovery about matters which are subject to the requirements of Section 364.163(2), Florida Statutes, which imposes a requirement on interexchange carriers to flow-through any switched network access rate reductions to their end-users; and
- d. seeks discovery of information beyond the scope of inquiry permitted by Section 364.164(3), Florida Statutes.

8. In response to Sprint's objections, Citizens contend that "this docket is about access prices that Sprint charges to its long distance competitors for long distance traffic," and, therefore, "Citizens' request for Sprint's own long distance calling is relevant to the issues in this docket." Citizens' Motion at ¶ 8. However, despite Citizens' feeble attempt to create a relevancy basis, there is absolutely no logical connection between what Sprint charges its alleged long distance competitors for access to its network, and what Sprint charges to its own end-user long distance customers. Certainly, what Sprint charges its own end-user long distance customers is not relevant to any of the issues in this proceeding.

9. Citizens seek to compel Sprint to provide an answer in response to Citizens' Interrogatory No. 28, which states:

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.

Sprint objected on the grounds that the interrogatory:

- a. seeks discovery of matters that are beyond the scope of issues to be considered by the Commission in this proceeding;
- b. seeks discovery related to end-user long distance services, but end-user long distance services are not a subject of Sprint-Florida's Petition;
- c. seeks discovery about matters which are subject to the requirements of Section 364.163(2), Florida Statutes, which imposes a requirement on interexchange carriers to flow-through any switched network access rate reductions to their end-users; and

- d. seeks discovery of information beyond the scope of inquiry permitted by Section 364.164(3), Florida Statutes.

10. In response, Citizens refer to their response to Sprint's Objection to Interrogatory No. 27. Sprint, accordingly, restates its counter-response to Citizens' response to Sprint's Objection to Interrogatory No. 27. (See ¶ 8, above.)

11. Citizens seek to compel Sprint to provide an answer in response to Citizens' Interrogatory No. 29, which states:

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.

Sprint objected on the grounds that the interrogatory:

- a. seeks discovery of matters that are beyond the scope of issues to be considered by the Commission in this proceeding;
- b. seeks discovery related to end-user long distance services, but end-user long distance services are not a subject of Sprint-Florida's Petition;
- c. seeks discovery about matters which are subject to the requirements of Section 364.163(2), Florida Statutes, which imposes a requirement on interexchange carriers to flow-through any switched network access rate reductions to their end-users; and
- d. seeks discovery of information beyond the scope of inquiry permitted by Section 364.164(3), Florida Statutes.

12. In response, Citizens refer to their response to Sprint's Objections to Interrogatory No. 27. In addition, Citizens contend that "[t]he 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)." Citizens' Motion at ¶ 10. Again, Sprint restates its counter-response to Citizens' response to Sprint's Objections to Citizens' Interrogatory No. 27. (See ¶ 8, above.) Additionally, Sprint points out that for purposes of addressing Sprint-Florida's Petition, the Commission must assume that the flow-through of access reductions by an intrastate interexchange telecommunications company required by Section 364.163(2), Florida Statutes, will take place as required. Clearly, Sprint's historical long distance prices or "optional calling plans" are not relevant to any issue to be considered by the Commission.

13. Citizens seek to compel Sprint to provide an answer in response to Citizens' Interrogatory No. 30, which states:

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.

Sprint objected on the grounds that the interrogatory:

- a. seeks discovery of matters that are beyond the scope of issues to be considered by the Commission in this proceeding;
- b. seeks discovery related to end-user long distance services, but end-user long distance services are not a subject of Sprint-Florida's Petition;

- c. seeks discovery about matters which are subject to the requirements of Section 364.163(2), Florida Statutes, which imposes a requirement on interexchange carriers to flow-through any switched network access rate reductions to their end-users; and
- d. seeks discovery of information beyond the scope of inquiry permitted by Section 364.164(3), Florida Statutes.

14. In response, Citizens refer to their response to Sprint's objection to Interrogatory No. 29. Sprint, accordingly, restates its counter-response to Citizens' response to Sprint's Objections to Interrogatory No. 29. (See ¶ 12, above.)

15. Citizens seek to compel Sprint to provide an answer in response to Citizens' Interrogatory No. 31, which states:

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. 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.

Sprint objected on the grounds that the interrogatory:

- a. seeks discovery of matters that are beyond the scope of issues to be considered by the Commission in this proceeding;

- b. seeks discovery related to end-user long distance services, but end-user long distance serves are not a subject of Sprint-Florida's Petition;
- c. seeks discovery about matters which are subject to the requirements of Section 364.163(2), Florida Statutes, which imposes a requirement on interexchange carriers to flow-through any switched network access rate reductions to their end-users; and
- d. seeks discovery of information beyond the scope of inquiry permitted by Section 364.164(3), Florida Statutes.

16. In response, Citizens refer to their response to Sprint's objections to Interrogatory No. 27. In addition, Citizens contend that their "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." Citizens' Motion at ¶ 12 (emphasis added). Sprint restates its counter-response to Citizens' response to Sprint's objections to Interrogatory Nos. 27 and 29. (See ¶¶ 8 and 12, above.) Additionally, Sprint observes that contrary to Citizens' contention that Interrogatory no. 31 "relates to Sprint's obligations under Section 364.163(2)," this interrogatory goes well beyond Sprint's obligations - which for purposes of Sprint's Petition, the Commission must assume Sprint will fulfill those obligations - and requires Sprint to speculate as to what all other interexchange carriers might do in markets served by BellSouth and Verizon Florida statewide. None of the issues in this proceeding contemplate or support such an inquiry, nor do they support a requirement for Sprint to speculate in the manner requested by Citizens.

17. Citizens seek to compel Sprint to provide an answer in response to Citizens' Interrogatory No. 32 a) through c), which states:

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.

Sprint objected on the grounds that the interrogatory:

- a. seeks discovery of matters that are beyond the scope of issues to be considered by the Commission in this proceeding;
 - b. seeks discovery related to end-user long distance services, but end-user long distance services are not a subject of Sprint-Florida's Petition; and
 - c. seeks discovery about matters which are subject to the requirements of Section 364.163(2), Florida Statutes, which imposes a requirement on interexchange carriers to flow-through any switched network access rate reductions to their end-users.
18. In response, Citizens refer to their response to Sprint's objections to Interrogatory No. 31. Sprint, accordingly, restates its counter-response to Citizens' response to Sprint's

objections to Interrogatory No. 31 (see ¶ 16, above), as well as Sprint's objections to Interrogatory No. 29. (See ¶ 12, above)

19. Citizens seek to compel Sprint to provide an answer in response to Citizens' Interrogatory No. 33, which states:

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.

Sprint objected on the grounds that the interrogatory:

- a. seeks discovery of matters that are beyond the scope of issues to be considered by the Commission in this proceeding;
- b. seeks discovery related to end-user long distance services, but end-user long distance services are not a subject of Sprint-Florida's Petition; and
- c. seeks discovery about matters which are subject to the requirements of Section 364.163(2), Florida Statutes, which imposes a requirement on interexchange carriers to flow-through any switched network access rate reductions to their end-users.

20. In response, Citizens refer to their response to Sprint's objections to Interrogatory No. 31. Sprint, accordingly, restates its counter-response to Citizens' response to Sprint's objections to Interrogatory No. 31. (See ¶ 16, above.)

21. Citizens seek to compel Sprint to provide an answer in response to Citizens' Interrogatory No. 35, which states:

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.

Sprint objected on the grounds that the interrogatory:

- a. seeks discovery of matters that are beyond the scope of issues to be considered by the Commission in this proceeding;
- b. seeks discovery related to end-user long distance services, but end-user long distance services are not a subject of Sprint-Florida's Petition; and
- c. seeks discovery about matters which are subject to the requirements of Section 364.163(2), Florida Statutes, which imposes a requirement on interexchange carriers to flow-through any switched network access rate reductions to their end-users.

22. In response, Citizens refer to their response to Sprint's objections to Interrogatory No. 31. Sprint, accordingly, restates its counter-response to Citizens' response to Sprint objections to Interrogatory No. 31. (See ¶ 16, above.)

23. Citizens seek to compel Sprint to provide an answer in response to Citizens' Interrogatory No. 36, which states:

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.

Sprint objected on the grounds that the interrogatory seeks the discovery of matters that are beyond the scope of the "benefits" to residential consumers to be considered by the Commission as specified in Section 364.164(1), Florida Statutes.

24. In response, Citizens contend that Interrogatory No. 36 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)." Citizens' Motion at ¶ 16. Obviously, Citizens' interpretation of the "benefits" to be considered by the Commission is different from what the statute requires. There is nothing in Section 364.164(1)(a) which requires a "net benefit" test, as contemplated by Citizens' roving inquiry. Rather, the standard to be considered by the Commission is whether granting the petition will "[r]emove current support for basic local telecommunications services that prevents the creation of a more attractive, competitive local exchange market for the benefit of residential consumers." Section 364.164(1)(a), Florida Statutes. This does not mean that the Commission must consider "net benefits" to reach its decision.

25. Citizens seek to compel Sprint to provide an answer in response to Citizens' Interrogatory No. 39, which states:

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.

Sprint objected on the grounds that the interrogatory:

- a. seeks discovery of matters that are beyond the scope of issues to be considered by the Commission in this proceeding;

- b. seeks discovery related to end-user long distance services, but end-user long distance services are not a subject of Sprint-Florida's Petition; and
- c. seeks discovery about matters which are subject to the requirements of Section 364.163(2), Florida Statutes, which imposes a requirement on interexchange carriers to flow-through any switched network access rate reductions to their end-users.

26. In response, Citizens refer to their response to Sprint's objections to Interrogatory No. 31. Sprint, accordingly, restates its counter-response to Citizens' response to Sprint's objections to Interrogatory No. 31. (See ¶ 16, above.)

27. Citizens seek to compel Sprint to provide an answer in response to Citizens' Interrogatory No. 40 a) through e), which states:

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.

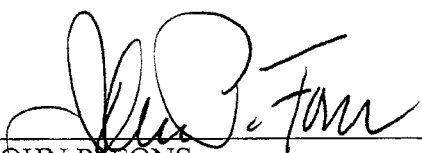
- d) Explain if this situation of having certain “interstate” long distance calling plans (but not similar “intrastate” plans) is unique to the company’s Florida operations, or if it is unique to states which have not rebalanced local rates and provide documentation to support this (such as comparing 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).

Sprint objected on the grounds that the interrogatory:

- a. seeks discovery of matters that are beyond the scope of issues to be considered by the Commission in this proceeding;
- b. seeks discovery related to end-user long distance services, but end-user long distance services are not a subject of Sprint-Florida's Petition;
- c. seeks discovery about matters which are subject to the requirements of Section 364.163(2), Florida Statutes, which imposes a requirement on interexchange carriers to flow-through any switched network access rate reductions to their end-users; and
- d. seeks discovery of information beyond the scope of inquiry permitted by Section 364.164(3), Florida Statutes.

28. In response, Citizens refer to their response to Sprint's objections to Interrogatory No. 29. Sprint, accordingly, restates its counter-response to Citizens' response to Sprint's objections to Interrogatory No. 29. (See ¶ 12, above.)

WHEREFORE, Sprint requests that Citizens' Motion to Compel be denied in all respects.



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ATTORNEYS FOR SPRINT-FLORIDA,
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 30th day of September, 2003, to the following:

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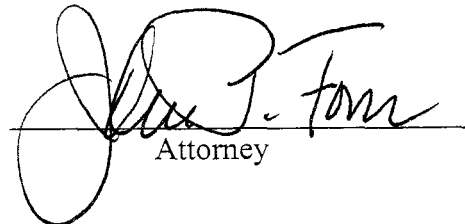
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