

ORIGINAL

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Via Overnight Delivery

October 23, 2003

Ms. Blanca Báyo  
Director, The Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399

Re: Docket No. 03085 1-TP – In re: Implementation of Requirements Arising from Federal Communications Commission's Triennial UNE Review: Local Circuit Switching for Mass Market Customers

Dear Ms. Báyo:

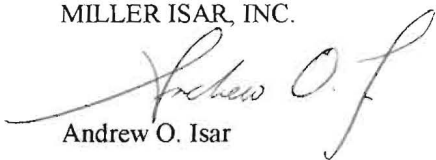
Enclosed are an original and three (3) copies of Granite Telecommunications, LLC's *Objections to Bellsouth's First Request for Production of Documents (1-21) and First Set of Interrogatories (1-83)* in the above-captioned proceeding.

Please acknowledge receipt of this filing by date stamping the additional copy of this transmittal letter and returning it to us in the self-addressed, postage paid envelope enclosed for this purpose.

Questions regarding this filing may be directed to the undersigned.

Sincerely,

MILLER ISAR, INC.

  
Andrew O. Isar

RECEIVED & FILED  
  
FPSC-BUREAU OF RECORDS

Regulatory Consultant to  
Granite Telecommunications, LLC

Enclosed

cc: Geoff Cookman, Granite Telecommunications, LLC  
Service List

AUS  
CAF  
CMP  
COM  
CTR  
ECR  
GCL  
OPC  
MMS  
SEC  
OTH

DOCUMENT NUMBER DATE  
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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Implementation of Requirements	)	
Arising From Federal Communications	)	Docket No.: 030852-TP
Commission Triennial UNE Review:	)	
Local Circuit Switching for Mass	)	Filed: October 23, 2003
Market Customers	)	
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**OBJECTIONS OF GRANITE TELECOMMUNICATIONS, LLC TO  
BELLSOUTH'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (1-21) AND  
FIRST SET OF INTERROGATORIES (1-83)**

Pursuant to the *Order Establishing Procedure*, Order No. PSC-03-1054-PCO-TP, issued September 22, 2003 ("Procedural Order"), Rule 28-106.206 of the Florida Administrative Code, and Rules 1.280 and 1.340 of the Florida Rules of Civil Procedure, Granite Telecommunications, LLC ("Granite") submits its preliminary objections to BellSouth Telecommunications, Inc.'s ("BellSouth") First Request for Production of Documents and First Set of Interrogatories to Granite.

Granite files these preliminary objections to comply with the seven (7) day requirement set forth in the *Procedural Order*. Granite reserves its right to supplement these objections when it files its responses and should additional grounds for objection arise as the issues and scope of this proceeding are more fully developed..

**PRELIMINARY GENERAL OBJECTIONS**

Granite makes the following general objections to the Requests, consistent with objections made by other competitive local exchange carriers in this proceeding:

1. Granite objects to the "Definitions" section, the "General Instructions," and the individual request items of BellSouth's First Requests for Production of Documents to Granite to the extent that they are overly broad, unduly burdensome, and/or oppressive. Granite will

attempt to identify specific requests to which this objection applies within the following specific objections.

2. Granite objects to the “Definitions,” the “General Instructions,” and the individual request items to the extent they are irrelevant and not likely to lead to the discovery of admissible evidence. Granite objects to requests that seek materials and documents that are inconsistent with or unrelated to the parameters and methodology of the impairment analysis prescribed by the Federal Communications Commission in its Triennial Review Order.

3. Granite objects to the “Definitions,” the “General Instructions,” and the request items to the extent they are vague, ambiguous, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these Requests.

4. Granite objects to the “General Instructions” and the request items of BellSouth’s First Set of Requests for Production and First Set of Interrogatories to Granite to the extent that they purport to impose discovery obligations on Granite that exceed the scope of discovery allowed by the applicable Florida Rules of Civil Procedure.

5. Granite objects to the “General Instructions” section and the individual request items of BellSouth’s First Requests for Production and First Set of Interrogatories to Granite to the extent that the “instructions” purport to seek disclosure of “all” documents, materials or information in Granite’s possession. Granite responses will provide all nonprivileged and otherwise discoverable information obtained by Granite after a reasonable and diligent search conducted in connection with the Requests. Such search will include a review of only those files that are reasonably expected to contain the requested documents and/or information. To the extent that “instructions” or individual requests require more, Granite objects on the grounds that

compliance would be unduly burdensome, expensive, oppressive, or excessively time consuming, and unnecessary to accomplish BellSouth's legitimate discovery needs.

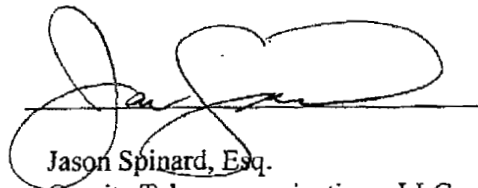
6. Granite objects to BellSouth's First Set of Requests for Production and First Set of Interrogatories to the extent that the requests would require disclosure of information that constitutes trade secrets and/or confidential and proprietary information that should be disclosed either not at all or only pursuant to the terms of a mutually acceptable confidentiality agreement and use of the Commission's rules and orders governing confidentiality

7. Granite objects to all requests which would require the production of materials and/or information which is already in BellSouth's possession or is in the public record before the Commission. To duplicate information that BellSouth already has or is readily available to BellSouth would be unduly burdensome and oppressive.

8. Granite will interpret each request as relating to Florida intrastate operations within BellSouth's service areas. To the extent any requests are not intended to relate to Florida intrastate operations within BellSouth's Florida service area, Granite objects to such requests as overbroad, irrelevant, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

9. Granite objects to the use of the terms "qualifying service" and "nonqualifying service" on the grounds the terms are subject to differing interpretations.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jason Spinard", is written over a horizontal line. The signature is stylized with large loops and a long horizontal stroke.

Jason Spinard, Esq.  
Granite Telecommunications, LLC  
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Email: [jspinard@granitenet.com](mailto:jspinard@granitenet.com)

October 23, 2003

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Objections of Granite Telecom Group, Inc. to BellSouth's First Request for Production of Documents and First Set of Interrogatories has been provided by electronic and U.S. Mail this 23rd day of October 2003, to the following:

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Division of Legal Services  
Florida Public Service Commission  
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Jeffrey J. Binder  
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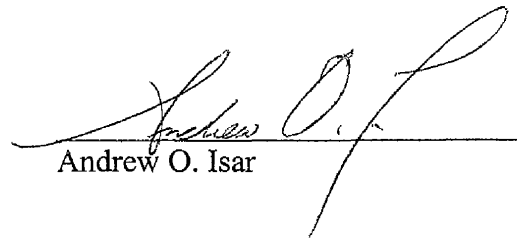
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Andrew O. Isar