

ORIGINAL
MILLER ISAR, INC.
REGULATORY CONSULTANTS

ANDREW O. ISAR

7901 SKANSIE AVENUE,
SUITE 240
GIG HARBOR, WA 98335
TELEPHONE: 253.851.6700
FACSIMILE: 253.851.6474
HTTP://WWW.MILLERISAR.COM

RECEIVED - PMSD
03 NOV -7 AM 9:50
COMMISSION
CLERK

Via Overnight Delivery

November 6, 2003

Ms. Blanca Bayó
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. Bayó:

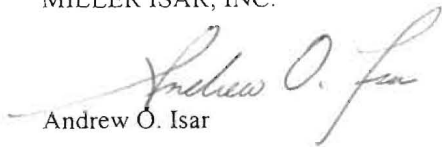
Enclosed are an original and fifteen (15) copies of Granite Telecommunications, LLC’s *Objections to Second Set of Interrogatories Numbers (85-112) and Second Request for Production of Documents Numbers (22) to Granite Telecommunications, LLC* in the above-captioned proceeding.

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

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

RECEIVED & FILED
17
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DAT
11133 NOV -7 8
FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Objections of Granite Telecommunications, LLC. to BellSouth's Second Set of Interrogatories and Second Request for Production of Documents to Granite Telecommunications, LLC has been provided by electronic and U.S. Mail this 6th day of November 2003, to the following:

Adam Teitzman, Staff Counsel
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
ateitzma@psc.state.fl.us

Nancy White
c/o Nancy Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301-1556
nancy.white@bellsouth.com

Richard Chapkis
Verizon Florida, Inc.
201 North Franklin Street
MC: FLTC0717
Tampa, Florida 33602
Richard.chapkis@verizon.com

De O'Roark, Esq.
MCI WorldCom Communications, Inc.
Suite 3200
6 Concourse Parkway
Atlanta, GA 30328
de.oroark@wcom.com

Donna McNulty, Esq.
MCI WorldCom Communications, Inc.
Suite 201
1203 Governors Square Blvd.
Tallahassee, FL 33201-2960
Donna.mcNulty@mci.com

Tracy Hatch, Esq.
AT&T
Suite 700
101 North Monroe Street
Tallahassee, FL 32301
thatch@att.com

Lisa Sapper
AT&T
Suite 8100
1200 Peachtree Street, N.E.
Atlanta, GA 30309
lsapper@att.com

Michael Gross
Florida Cable Telecommunications
246 East 6th Avenue
Tallahassee, Florida 32302
mgross@fcta.com

Matthew Feil
Florida Digital Network, Inc.
390 North Orange Avenue, Suite 2000
Orlando, Florida 32801
mfeil@mail.fdn.com

Jeffrey J. Binder
Allegiance Telecom, Inc.
1919 M Street, NW
Washington, DC 20037
Jeff.Binder@allegiancetelecom.com

Floyd R. Self
Messer, Caparello & Self
215 South Monroe Street, Suite 701
Tallahassee, FL 32301
fself@lawfla.com

Norman H. Horton, Esq.
Messer Caparello & Self
Suite 701
215 South Monroe Street
Tallahassee, FL 32301
nhorton@lawfla.com

Nanette Edwards
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, Alabama 35802
nedwards@itcdeltacom.com

Jason Rojas
Staff Counsel
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
jrojas@psc.state.fl.us

Jeremy Susac
Staff Counsel
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
jsusac@psc.state.fl.us

Marva Brown Johnson
KMC Telecom III, LLC
1755 North Brown Road
Lawrenceville, GA 30034-811
Marva.johnson@kmctelecom.com

Susan S. Masterton
Sprint-Florida
Sprint Communications Co. L.P.
PO Box 2214
1313 Blair Stone Road
Tallahassee, FL 32316-2214
susan.masterton@mail.sprint.com

Jason Spinard, Esq
Granite Telecommunications, LLC
234 Copeland Street
Quincy, MA 01269
jspinard@granitenet.com

Geoff Cookman
Granite Telecommunications, LLC
234 Copeland Street
Quincy, MA 02169
gcookman@granitenet.com

Rand Currier
Granite Telecommunications, LLC
234 Copeland Street
Quincy, MA 01269
rcurrier@granitenet.com

Jean Houck
Business Telecom, Inc.
4300 Six Forks Road
Raleigh, NC 27609
Jean.houck@btitelecom.net

Kimberly Caswell
Verizon Florida, Inc.
One Tampa City Center
201 North Franklin Street(33602)
PO Box 110, FLTC0007
Tampa, FL 33601-0110

Jake Jennings
NewSouth Communications Corp
Two North Main Center
Greenville, SC 29601-2719

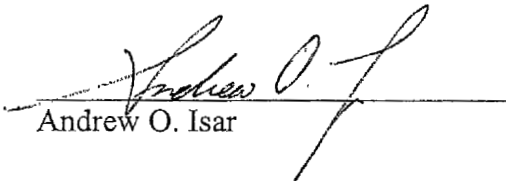
Joseph A. McGlothlin
McWhirter, Reeves, McGlothlin, Davidson, Kaufman &
Arnold PA
117 South Gadsden
Tallahassee, FL 32301
jmclglothlin@mac-law.com

Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin, Davidson,
Arnold PA
117 South Gadsden
Tallahassee, FL 32301
vkaufman@mac-law.com

Charles E. Watkins
Covad Communications Company
19th Floor
1230 Peachtree Street, N.E.
Atlanta, GA 30309
gwatkins@covad.com

Margaret Ring
Regulatory Affairs
Network Telephone Corporation
815 S. Palafox St.
Pensacola, FL 32501
Margaret.Ring@networktelephone.net

Scott Kassman
FDN Communications
390 North Orange Avenue
Suite 2000
Orlando, FL 32801-1640
skassman@mail.fdn.com


Andrew O. Isar

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)	
<hr/>		

**OBJECTIONS OF GRANITE TELECOMMUNICATIONS, LLC TO
BELLSOUTH TELECOMMUNICATIONS, INC.'S
SECOND SET OF INTERROGATORIES NUMBERS (85 - 112) AND SECOND
REQUEST FOR PRODUCTION OF DOCUMENTS NUMBERS (22)
TO GRANITE TELECOMMUNICATIONS, LLC**

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”) Second Set of Interrogatories and Second Request for Production of Documents and to Granite, served on October 31, 2003.

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 Second Set of Requests for Production and Second 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 Second Requests for Production and Second 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.

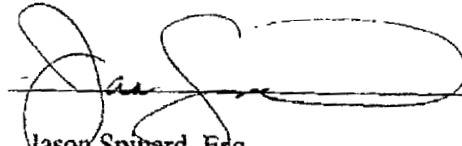
6. Granite objects to BellSouth’s Second Set of Requests for Production and Second Set of Interrogatories to the extent that the requests would require disclosure of information that constitutes trade secrets and/or confidential and proprietary information that should be disclosed either not at all or 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,



Jason Spinard, Esq.
Granite Telecommunications, LLC
234 Copeland Street
Quincy, MA 02169
Telephone: 617.847.1500
Facsimile: 617.847.0931
Email: jspinard@granitenet.com

November 6, 2003