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November 10, 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

RECEIVED  
NOV 10 PM 4:24  
COMMISSION  
CLERK

Re: Docket No. 030852-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint are the original and 15 copies of Sprint-Florida, Incorporated's ("Sprint") Notice of Service of Sprint's Request for Clarification and General and Specific Objections to MCIMetro Access Transmission Services, LLC and MCI WorldCom Communications, Inc.'s First Set of Interrogatories (Nos. 1-68) and First Request for Production of Documents (No. 1)

Copies are being served on the parties in this docket via Electronic and US mail pursuant to the attached certificate of service.

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

Sincerely,

Susan S. Masterton

Enclosure

RECEIVED & FILED

*lh*  
FPSC-BUREAU OF RECORDS

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- OTH \_\_\_\_\_

DOCUMENT NUMBER-DATE

11234 NOV 10 03

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE  
DOCKET NO. 030851-TP & 030852-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served both Electronic Mail and by U.S. Mail on this 10<sup>th</sup> day of November, 2003 to the following:

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Tallahassee, FL 32301

  
Susan S. Masterton by 

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Implementation of requirements arising ) Docket No. 030852-TP  
From Federal Communications Commission )  
Triennial UNE review: Location Specific-Review )  
For DS1, DS3 and Dark Fiber Loops and ) Filed: November 10, 2003  
Route-Specific Review for DS1, DS3 and )  
Dark Fiber Transport )  
\_\_\_\_\_ )

**SPRINT'S REQUEST FOR CLARIFICATION AND GENERAL AND SPECIFIC  
OBJECTIONS TO MCIMETRO ACCESS TRANSMISSION SERVICES, LLC AND MCI  
WORLD COM COMMUNICATIONS, INC.'S FIRST SET OF INTERROGATORIES  
(Nos. 1-68 ) AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (No. 1)**

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 MCIMetro Access Transmission Services, LLC and MCI WorldCom Communications, Inc.'s (MCI's) First Set of Interrogatories (Nos. 1-68) and First Request for Production of Documents (No. 1), which were served on Sprint by e-mail on November 3, 2003.

**INTRODUCTION**

The objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the seven-day requirement set forth in Order No. PSC-03-1055-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, revise, or modify its objections at the time that it serves its responses on MCI. Moreover, should Sprint determine that a Protective Order is necessary with respect to any of the material requested by MCI, Sprint reserves the right to file a motion with the Commission seeking such a order at the time that it serves its answers and responses on MCI.

DOCUMENT NUMBER DATE

11234 NOV 10 8

FPSC-COMMISSION CLERK

### **REQUEST FOR CLARIFICATION**

MCI has served its discovery requests on Sprint Communications Company Limited Partnership (the CLEC); however, the nature of the requests appear to be more appropriately directed to Sprint-Florida, Incorporated (the ILEC). In Discussion with MCI Counsel, Sprint understands these requirements were intended to be served on Sprint-Florida, Inc. and Sprint will responds to the request on that basis.

### **GENERAL OBJECTIONS**

Sprint makes the following General Objections to MCI's First Set of Interrogatories (Nos. 1-68) ("First IRR") and First Request for Production of Documents (No. 1) ("First POD"). These general objections apply to each of the individual requests and interrogatories in the First IRR and First POD, respectively, and will be incorporated by reference into Sprint's answers when they are served on MCI.

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 MCI'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 MCI'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 MCI'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 MCI's requests proprietary confidential business information which is not subject to the "trade secrets" privilege, Sprint will make such information available to counsel for MCI

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 MCI'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 FIRST IRR**

**MCIC-24** Please provide the following information for each fiber or conduit deployment project by Sprint in Florida since January 1, 2000:

- (a) type, size, and capacity of conduit installed along all or any separate portion of the route;
- (b) type and number of fibers initially installed along all or any separate portion of the route;
- (c) type and number of fibers for each and every subsequent installation along all or any portion of the route;

- (d) all available budgetary and actual cost data for both initial and any subsequent installations, including all costs for permits, authority, ROW, lobbying, public policy, excavation, trenching, boring, backfill, surface repair, remediation, vault construction, termination, payments-in-kind, related usage rights, materials (including conduit and cabling), and any other expenses necessary to the project. Please identify all supporting documents for disclosure.

**OBJECTION:** This question appears to address information related to establishing a case for a finding of non-impairment based on a potential deployment analysis. Sprint is not challenging the FCC's national finding of impairment for transport based on a potential deployment analysis and, therefore, Sprint objects to this Interrogatory on the basis that it is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence.

**MCIC-25** Please provide the following information for each planned fiber or conduit deployment project by Sprint in Florida for the next 3 years: (Include in this response any current projects not included in T-111, as well as future projects.)

- (a) type, size, and capacity of conduit to be installed along all or any separate portion of the route;
- (b) type and number of fibers to be initially installed along all or any separate portion of the route,
- (c) type and number of fibers for each and every planned subsequent installation along all or any portion of the route;
- (d) all available budgetary cost data and estimates for both initial and any subsequent installations, including all costs and estimates for permits, authority, ROW, lobbying, public policy, excavation, trenching, boring, backfill, surface repair, remediation, vault construction, termination, payments-in-kind, related usage rights, materials (including conduit and cabling), and any other expenses necessary to the project. Please identify all supporting documents for disclosure.

**OBJECTION:** This question appears to address information related to establishing a case for a finding of non-impairment based on a potential deployment analysis. Sprint is not challenging the FCC's national finding of impairment for transport based on a potential



deployment analysis and, therefore, Sprint objects to this Interrogatory on the basis that it is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence.

**MCIC-26** Please identify for disclosure all contracts, agreements, tariffs, or other governing documents by which Sprint:

- (a) sells, rents, leases, or otherwise provides telecommunications transport services between its switches and/or wire centers to others in Florida;
- (b) buys, rents, leases, or otherwise acquires telecommunications transport services between its switches and/or wire centers from others in Florida.

**OBJECTION:** This question appears to address information related to establishing a case for a finding of non-impairment based on a potential deployment analysis. Sprint is not challenging the FCC's national finding of impairment for transport based on a potential deployment analysis and, therefore, Sprint objects to this Interrogatory on the basis that it is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence.

**MCIC-27** With respect to all documents identified in your response to 0, please provide quarterly totals for the last 3 years of the amount of transport capacity provided or acquired, identifying the quantity, route, and opposite party for each segment.

**OBJECTION:** This question appears to address information related to establishing a case for a finding of non-impairment based on a potential deployment analysis. Sprint is not challenging the FCC's national finding of impairment for transport based on a potential deployment analysis and, therefore, Sprint objects to this Interrogatory on the basis that it is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence.

**MCIC-28** Please describe in detail any price floors or other limitation imposed by any law, regulation, [PUC] orders or rulings that constrain Sprint's ability to reduce prices for each of the following: a) dark fiber service, b) OC-n level service, c) DS-3 service and d) DS-1

service. For each such price floor or other limitation, provide the basis for the calculation for the price floor or other limitation (e.g., price freeze, cost-based calculation, etc.).

**OBJECTION:** This question appears to address information related to establishing a case for a finding of non-impairment based on a potential deployment analysis. Sprint is not challenging the FCC's national finding of impairment for transport based on a potential deployment analysis and, therefore, Sprint objects to this Interrogatory on the basis that it is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence.

**MCIC-29** Please provide a description and identify for disclosure all supporting documentation for all Sprint currently offered bundles and volume discounts involving the following: a) dark fiber service, b) OC-n level service, c) DS-3 service and d) DS-1 service.

**OBJECTION:** This question appears to address information related to establishing a case for a finding of non-impairment based on a potential deployment analysis. Sprint is not challenging the FCC's national finding of impairment for transport based on a potential deployment analysis and, therefore, Sprint objects to this Interrogatory on the basis that it is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence.

**MCIC-30** Please provide a description and identify for disclosure all supporting documentation for all Sprint planned or contemplated bundles and volume discounts involving the following: a) dark fiber service, b) OC-n level service, c) DS-3 service and d) DS-1 service.

**OBJECTION:** This question appears to address information related to establishing a case for a finding of non-impairment based on a potential deployment analysis. Sprint is not challenging the FCC's national finding of impairment for transport based on a potential deployment analysis and, therefore, Sprint objects to this Interrogatory on the basis that it is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence.

**MCIC-31** Please identify for disclosure all documents that address or assess the risk of stranded transport capacity on all or any portion of Sprints' existing network in Florida.

**OBJECTION:** This question appears to address information related to establishing a case for a finding of non-impairment based on a potential deployment analysis. Sprint is not challenging the FCC's national finding of impairment for transport based on a potential deployment analysis and, therefore, Sprint objects to this Interrogatory on the basis that it is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence.

**MCIC-32** For this and the immediately following four questions, the phrase "lit enterprise circuit(s)" means one or more circuits at the DS-1, DS-3, or OC-x capacity levels. Please describe all your current procedures for moving portions of lit enterprise circuits from your own network to a CLEC or IXC network. Include all procedures for circuits which serve multiple end-users by virtue of connection to multiple Sprint "tail circuits" or "loops" via Sprint provided MUX or DACS equipment.

**OBJECTION:** This question appears to address information related to establishing a case for a finding of non-impairment based on a potential deployment analysis. Sprint is not challenging the FCC's national finding of impairment for transport based on a potential deployment analysis and, therefore, Sprint objects to this Interrogatory on the basis that it is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence.

**MCIC-33** When a lit enterprise circuit provided by Sprint under UNE procedures or Special Access tariffs serves multiple end-user customers through Sprint provided MUX or DACS equipment, will Sprint perform a "hot cut" of all or part of the lit enterprise circuit portion to non-Sprint provided transport?

(a) If no, why not?

(c) If yes, will Sprint perform this function based on a single Access Service Request ("ASR") submission by the carrier customer or does Sprint require multiple ASRs? If the answer is that a single ASR is acceptable, please identify any prior periods when multiple ASRs were required.

**OBJECTION:** This question appears to address information related to establishing a case for a finding of non-impairment based on a potential deployment analysis. Sprint is not challenging the FCC's national finding of impairment for transport based on a potential deployment analysis and, therefore, Sprint objects to this Interrogatory on the basis that it is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence.

**MCIC-34** As part of any required transition from UNE enterprise circuit transport to non-Sprint transport, will Sprint perform a "hot cut" of all or part of any lit enterprise circuit portion to non-Sprint provided transport?

(a) If no, why not?

(b) If yes, will Sprint perform this function based on a single service request, or will Sprint require separate requests for each end-user circuit?

**OBJECTION:** This question appears to address information related to establishing a case for a finding of non-impairment based on a potential deployment analysis. Sprint is not challenging the FCC's national finding of impairment for transport based on a potential deployment analysis and, therefore, Sprint objects to this Interrogatory on the basis that it is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence.

**MCIC-35** Has Sprint ever imposed restrictions on the number of lit enterprise circuits it would transition from the Sprint network to the networks of others? If yes, state all such restrictions imposed and all terms of such restrictions (i.e., any specifics as to numbers of such transitions within a specific time and/or region; conditions as to time "out of service"; any required impositions of unfavorable customer conditions; any mandatory classification of any such transition as "project work" [or other non-standard undertaking] thereby changing or avoiding any otherwise applicable service guarantees, performance standards, or terms ensuring quality of service, etc.)

**OBJECTION:** This question appears to address information related to establishing a case for a finding of non-impairment based on a potential deployment analysis. Sprint is not challenging the FCC's national finding of impairment for transport based on a potential

deployment analysis and, therefore, Sprint objects to this Interrogatory on the basis that it is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence.

**MCIC-36** Please identify for disclosure all internal methods & procedures, business rules, memoranda, communications, e-mail, reports, etc. which describe in any way issues related to the migration of lit enterprise circuits or circuit portions from the Sprint network to any non-Sprint network. In addition, if not already encompassed in the prior sentence, also identify for disclosure all such documents which discuss any potential means of discouraging such moves, or any complaints or comments received relating to procedures used to undertake such moves, or any refusals of such moves.

**OBJECTION:** This question appears to address information related to establishing a case for a finding of non-impairment based on a potential deployment analysis. Sprint is not challenging the FCC's national finding of impairment for transport based on a potential deployment analysis and, therefore, Sprint objects to this Interrogatory on the basis that it is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence.

**MCIC-37** Please state the proportion of "unlit" or "dark" fiber in loop feeder and distribution plant a) for each of the last 5 years; b) currently; and c) all projections for the next 3 years.

**OBJECTION:** This question appears to address information related to establishing a case for a finding of non-impairment based on a potential deployment analysis. Sprint is not challenging the FCC's national finding of impairment for transport based on a potential deployment analysis and, therefore, Sprint objects to this Interrogatory on the basis that it is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence.

**MCIC-38** Please state the "OCn" level at which fiber in the loop feeder and distribution plant has been, is being, or will be operated:

- (a) for each of the last 3 years;
- (b) currently; and

- (c) all projections for the next 3 years.

**OBJECTION:** This question appears to address information related to establishing a case for a finding of non-impairment based on a potential deployment analysis. Sprint is not challenging the FCC's national finding of impairment for transport based on a potential deployment analysis and, therefore, Sprint objects to this Interrogatory on the basis that it is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence.

**MCIC-39** Please describe and supply supporting documentation for any change in the last three years, and any change currently in progress, in deployment plans or schedules which would tend to either a) lower or reduce the future transmission ("OCn") level of any fiber in the loop feeder and/or distribution plant; b) reduce any expected, anticipated, or planned increases in the future transmission ("OCn") level of any fiber in the loop feeder and/or distribution plant; c) increase the number of fibers used at any point in the loop feeder and/or distribution plant; or d) reduce the number of "unlit" fibers available for provision of "dark fiber" to others.

**OBJECTION:** This question appears to address information related to establishing a case for a finding of non-impairment based on a potential deployment analysis. Sprint is not challenging the FCC's national finding of impairment for transport based on a potential deployment analysis and, therefore, Sprint objects to this Interrogatory on the basis that it is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence.

**MCIC-61** Please provide and identify for disclosure all documents supporting the following information for each fiber or conduit deployment project by Sprint in Florida since January 1, 2000:

- (a) type, size, and capacity of conduit installed along all or any separate portion of the route;
- (b) type and number of fibers initially installed along all or any separate portion of the route;
- (c) type and number of fibers for each and every subsequent installation along all or any portion of the route;

- (d) all available budgetary and actual cost data for both initial and any subsequent installations, including all costs for permits, authority, ROW, lobbying, public policy, excavation, trenching, boring, backfill, surface repair, remediation, vault construction, termination, payments-in-kind, related usage rights, materials (including conduit and cabling), and any other expenses necessary to the project.

**OBJECTION:** This question appears to address information related to establishing a case for a finding of non-impairment based on a potential deployment analysis. Sprint is not challenging the FCC's national finding of impairment for loops based on a potential deployment analysis and, therefore, Sprint objects to this Interrogatory on the basis that it is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence.

**MCIC-62** Please provide and identify for disclosure all documents supporting the following information for each planned fiber or conduit deployment project by Sprint in Florida for the next 3 years: (Include in this response any current projects not included in 0, as well as future projects.)

- (a) type, size, and capacity of conduit to be installed along all or any separate portion of the route;
- (b) type and number of fibers to be initially installed along all or any separate portion of the route;
- (c) type and number of fibers for each and every planned subsequent installation along all or any portion of the route;
- (d) all available budgetary cost data and estimates for both initial and any subsequent installations, including all costs and estimates for permits, authority, ROW, lobbying, public policy, excavation, trenching, boring, backfill, surface repair, remediation, vault construction, termination, payments-in-kind, related usage rights, materials (including conduit and cabling), and any other expenses necessary to the project.

**OBJECTION:** This question appears to address information related to establishing a case for a finding of non-impairment based on a potential deployment analysis. Sprint is not challenging the FCC's national finding of impairment for loops based on a potential

deployment analysis and, therefore, Sprint objects to this Interrogatory on the basis that it is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence.

**MCIC-63** Please identify for disclosure all contracts, agreements, tariffs, or other governing documents by which Sprint:

- (a) sells, rents, leases, or otherwise provides telecommunications loop facilities to others in Florida;
- (b) buys, rents, leases, or otherwise acquires loop facilities from others in Florida.

**OBJECTION:** This question appears to address information related to establishing a case for a finding of non-impairment based on a potential deployment analysis. Sprint is not challenging the FCC's national finding of impairment for loops based on a potential deployment analysis and, therefore, Sprint objects to this Interrogatory on the basis that it is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence.

**MCIC-64** With respect to all documents identified in your response to 0, please provide quarterly totals since January 1, 2000 of the amount of loop capacity provided or acquired, identifying the quantity, route, and opposite party for each segment.

**OBJECTION:** This question appears to address information related to establishing a case for a finding of non-impairment based on a potential deployment analysis. Sprint is not challenging the FCC's national finding of impairment for loops based on a potential deployment analysis and, therefore, Sprint objects to this Interrogatory on the basis that it is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence.

**MCIC-65** Please describe in detail any price floor(s) or other limitation(s) imposed by any law, regulation, [PUC] orders or rulings that constrain Sprint's ability to reduce prices for each of the following:

- (a) dark fiber loop service;
- (b) OC-n level loop service;



- (c) DS-3 loop service; and
- (d) DS-1 loop service. For each such price floor or other limitation, provide the basis for the calculation for the price floor or other limitation (e.g., price freeze, cost-based calculation, etc.).

**OBJECTION:** This question appears to address information related to establishing a case for a finding of non-impairment based on a potential deployment analysis. Sprint is not challenging the FCC's national finding of impairment for loops based on a potential deployment analysis and, therefore, Sprint objects to this Interrogatory on the basis that it is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence.

**MCIC-66** Please provide a description and identify for disclosure all documentation for all Sprint currently offered bundles and volume discounts involving the following: a) dark fiber loop service, b) OC-n level loop service, c) DS-3 loop service and d) DS-1 loop service.

**OBJECTION:** This question appears to address information related to establishing a case for a finding of non-impairment based on a potential deployment analysis. Sprint is not challenging the FCC's national finding of impairment for loops based on a potential deployment analysis and, therefore, Sprint objects to this Interrogatory on the basis that it is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence.

**MCIC-67** Please provide a description and identify for disclosure all supporting documentation for all Sprint planned or contemplated bundles and volume discounts involving the following: a) dark fiber loop service, b) OC-n level loop service, c) DS-3 loop service and d) DS-1 loop service.

**OBJECTION:** This question appears to address information related to establishing a case for a finding of non-impairment based on a potential deployment analysis. Sprint is not challenging the FCC's national finding of impairment for loops based on a potential

deployment analysis and, therefore, Sprint objects to this Interrogatory on the basis that it is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence.

**MCIC-68** Please identify for disclosure all documents in your possession, custody or control that address or assess the risk of stranded loop capacity on all or any portion of Sprints' existing network in Florida.

**OBJECTION:** This question appears to address information related to establishing a case for a finding of non-impairment based on a potential deployment analysis. Sprint is not challenging the FCC's national finding of impairment for loops based on a potential deployment analysis and, therefore, Sprint objects to this Interrogatory on the basis that it is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence.

#### **SPECIFIC OBJECTIONS FIRST POD**

**MCIC-1** Produce all documents identified in response to each interrogatory in MCI's First Set of Interrogatories to Sprint. In producing documents, please identify and group documents by each individual interrogatory number.

**OBJECTION:** As set forth above, Sprint is not challenging the FCC's national finding of impairment for loops based on a potential deployment analysis. To the extent this POD requests documents related to a potential deployment analysis, Sprint objects to this request on the basis that it is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence.

DATED this 10th day of November 2003.

*Susan S. Masterton by CW*

SUSAN S. MASTERTON

P.O. Box 2214

Tallahassee, FL 32316-2214

(850) 599-1560 (phone)

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[susan.masterton@mail.sprint.com](mailto:susan.masterton@mail.sprint.com)

ATTORNEY FOR SPRINT