

12. In light of the short period of time Verizon was afforded to respond to the First Set, discovery and the development of Verizon's position are necessarily ongoing, and Verizon's response may be subject to supplementation or further refinement. Verizon therefore reserves the right, at its discretion, to supplement or modify its response. However, Verizon does not assume an affirmative obligation to supplement its answers on an ongoing basis.

### INTERROGATORIES:

25. Referencing Table I of witness Gordon's direct testimony, at page 10, please provide the average billed charges for the combination of flat-rate residential basic service and central office features.

#### **Specific Objection to Interrogatory No. 25:**

In addition to its General Objections, which are incorporated herein by reference, Verizon objects to this interrogatory on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this proceeding. Pursuant to Florida Statutes Section 364.164(1)(i), the Commission must consider whether Verizon's basic residential local telecommunications services receive support. Average billed charges for central office features are not relevant to the rebalancing of basic local telecommunications rates in accordance with Section 364.164. Moreover, Verizon objects to this interrogatory on the grounds that it seeks information precluded from discovery by the limitations imposed by Florida Statutes, Section 364.164(3). Even if the Commission broadly construes Section 364.164(3) to mean that discovery is limited to issues addressed in Verizon's Petition (which it should not), Verizon's Petition does not focus on "central office features."

#### **Response:**

Verizon has objected to this interrogatory and therefore no response is being provided.

#### **Supplemental Response:**

The average billed charges for the combination of flat-rate residential basic service and central office features (i.e., vertical services) for the month of March, 2003 is \$\*\*\* \*\*\*. **REDACTED**