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December 1, 2003

VIA HAND DELIVERY

Blanca S. Bayo, Director
Division of Records and Reporting
Betty Easley Conference Center
4075 Esplanade Way
Tallahassee, Florida 32399-0870

Re: Docket Nos.: 030851-TP

Dear Ms. Bayo:

On behalf of the Florida Competitive Carriers Association (FCCA), enclosed for filing and distribution are the original and 15 copies of the following:

- ▶ Florida Competitive Carriers Association's Objections to Staff's First Set of Interrogatories (Nos. 1 - 7) and First Request for Production of Documents (Nos. 1- 8).

Please acknowledge receipt of the above on the extra copy of and return the stamped copies to me. Thank you for your assistance.

RECEIVED & FILED

JH
FPSC-BUREAU OF RECORDS

Sincerely,

Joe McGlothlin

Joseph A. McGlothlin

AUS _____
CAF _____
CMP _____
COM _____ JAM/bae
CTR _____ Enclosure
ECR _____
GCL _____
OPC _____
MMS _____
SEC _____
OTH _____

DOCUMENT NUMBER-DA

12161 DEC-1 8

McWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, KAUFMAN & ARNOLD, P.A.

FPSC-COMMISSION CLERK

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03 DEC -1 PM 4:32
COMMISSION
CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising
From Federal Communications Commission
Triennial UNE review: Local Circuit Switching
For Mass Market Customers

Docket No. 030851-TP
Filed: December 1, 2003

**FLORIDA COMPETITIVE CARRIERS ASSOCIATION'S
OBJECTIONS TO STAFF'S FIRST SET OF INTERROGATORIES (NOS. 1 - 7) AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1 - 8)**

The Florida Competitive Carriers Association (FCCA), pursuant to Rules 1.280, 1.340, 1.350, Florida Rules of Civil Procedure, and Rule 28.106-206, Florida Administrative Code, hereby files the following General Objections Staff's First Second Set of Interrogatories (1 - 7) and First Request for Production of Documents (Nos. 1 - 8) to the FCCA.

GENERAL OBJECTIONS

1. The FCCA objects to the interrogatories and requests for production to the extent they seek to impose an obligation on the FCCA to respond on behalf of persons that are not parties to this case on the grounds that such interrogatories and requests for production are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. The FCCA objects to the interrogatories and requests for production to the extent they are intended to apply to matters other than those subject to the jurisdiction of the Commission. The FCCA objects to such interrogatories and requests for production as being irrelevant, overly broad, unduly burdensome, and oppressive.

3. The FCCA objects to each and every interrogatory and request for production 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.

DOCUMENT NUMBER-DATE

12161 DEC-18

FPSC-COMMISSION CLERK

4. The FCCA objects to each and every interrogatory and request for production insofar as the interrogatories and requests are vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these interrogatories and requests for production. Any answers provided by the FCCA in response to the interrogatories and requests for production will be provided subject to, and without waiver, of the foregoing objection.

5. The FCCA objects to each and every interrogatory and request for production insofar as it is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence. The FCCA will attempt to note in its responses each instance where this objection applies.

6. The FCCA objects to providing information to the extent that such information is already in the public record before the Commission or in Staff's possession.

7. The FCCA objects to Staff's discovery requests, instructions and definitions, insofar as they seek to impose obligations on the FCCA that exceed the requirements of the Florida Rules of Civil Procedure and Florida Law.

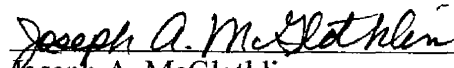
8. The FCCA objects to each and every interrogatory and request for production, insofar as any of them are unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. The FCCA objects to each and every interrogatory and request for production to the extent that the interrogatories and/or requests would require disclosure of information that constitutes "trade secrets" pursuant to Section 90.506 and/or proprietary confidential business information.

10. The FCCA objects to any discovery request that seeks to obtain "all" of particular

documents, items, or information to the extent that such requests are overly broad and unduly burdensome. Any answers provided by the FCCA in response to this discovery will be provided subject to, and without waiver of, the foregoing objection.

11. The FCCA objects to any discovery request that is not limited in time or is not limited to a period of time that is relevant to the issues before the Commission and/or reasonably related to Staff's legitimate discovery needs.


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Association

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing the Florida Competitive Carriers Association's Objections to Staff's First Set of Interrogatories (Nos. 1- 7) and First Request for Production of Documents (Nos. 1 – 8) has been provided by (*) hand delivery, (*) hand deliver, (**)email and U.S. Mail this 1st day of December 2003, to the following:

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