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December 15, 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

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Re: Docket No. 030851-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint-Florida, Incorporated are the original and 15 copies of Sprint's General and Specific Objections to Staff's Second Set of Interrogatories (Nos. 14-17) and Second Request for Production of Documents (Nos. 16-17)

Copies are being served on the parties in this docket 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 850/847-0244.

Sincerely,

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FPSC-BUREAU OF RECORDS

Susan S. Masterton

Enclosure

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

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail and U.S. mail on this 15th day of December, 2003 to the following:

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Atlanta, GA 30309-3579

BellSouth Telecommunications,
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R. D. Lackey/M. Mays/N.
White/J. Meza
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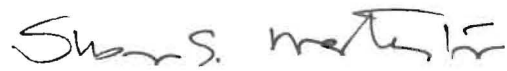
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Susan S. Masterton

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising)	Docket No. 030851-TP
From Federal Communications Commission)	
Triennial UNE review: Local Circuit Switching)	Filed: December 15, 2003
For Mass Market Customers)	
_____)	

SPRINT'S GENERAL AND SPECIFIC OBJECTIONS TO STAFF'S SECOND SET OF INTERROGATORIES (Nos. 14-17) AND SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (Nos. 16-17)

Pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.340, 1.350 and 1.280(b), Florida Rules of Civil Procedure, Sprint-Florida, Incorporated hereby submits the following General and Specific Objections to Staff of the Florida Public Service Commission's (Staff's) Second Set of Interrogatories (Nos. 14-17) and Second Request for Production of Documents (Nos. 16-17), which were served on Sprint by e-mail on December 8, 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-03-1054-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 Staff. Moreover, should Sprint determine that a Protective Order is necessary with respect to any of the material requested by Staff, 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 Staff.

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GENERAL OBJECTIONS

Sprint makes the following General Objections to Staff's Second Set of Interrogatories (Nos. 14-17) ("Second IRR") and Second Request for Production of Documents (Nos. 16-17) ("Second POD"). These general objections apply to each of the individual requests and interrogatories in the Second IRR and Second POD, respectively, and will be incorporated by reference into Sprint's answers when they are served on Staff.

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

17. Please identify any CLEC switches located within one of your central offices.

OBJECTION: This question appears to address information related to establishing a case for a finding of non-impairment for unbundled local circuit switching. Sprint is not challenging the FCC's national finding of impairment for unbundled local circuit switching 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 SECOND POD

16. Please provide maps indicating your wire center serving areas.

OBJECTION: This question appears to address information related to establishing a case for a finding of non-impairment for unbundled local circuit switching. Sprint is not challenging the FCC's national finding of impairment for unbundled local circuit switching and, therefore, Sprint objects to this POD on the basis that it is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence.

17. Complete the electronic spreadsheet “switching_questions_FL_SprintFL.xls with the following information for each Florida serving switch with which you provide service, either to end users or other carriers.

(a) Please provide the 11 digit CLLI for every switch that provides qualifying service anywhere in the state of Florida, regardless of whether the switch itself is located in Florida. *(Column A)*

(b) Please provide the 11-digit CLLI for the wire center serving area that is served by the above named switch. *(Column B)*

(c) Please provide the name for the wire center serving area. *(Column C)*

(d) Please provide the vertical coordinate of the wire center serving area. *(Column D)*

(e) Please provide the horizontal coordinate of the wire center serving area. *(Column E)*

(f) Please provide the street address of the wire center. *(Column F)*

(g) Please provide the city of the wire center. *(Column G)*


(h) Please provide the five-digit zip code of the wire center. *(Column H)*

(i) Beginning in *column I row 2*, identify by full name each CLEC that is being provided unbundled local switching on each of your switches, as shown in the table below.

(j) Beginning in *column I*, identify the number of UNE-P being provide on each switch to each CLEC.

OBJECTION: This question appears to address information related to establishing a case for a finding of non-impairment for unbundled local switching. Sprint is not challenging the FCC's national finding of impairment for unbundled local circuit switching and, therefore, Sprint objects to this POD on the basis that it is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence.

DATED this 15th day of December 2003.



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