

ORIGINAL



Susan S. Masterton
Attorney

Law/External Affairs
FLTLH00103
1313 Blair Stone Rd
Tallahassee, FL 32301
Voice 850 599 1560
Fax 850 878 0777
susan.masterton@mail.sprint.com

December 17, 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

COMMISSION
CLERK

DEC 17 PM 4:32

DEC 17 2003

Re: Docket No. 030852-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 First Set of Interrogatories (Nos. 1-14) and First Request for Production of Documents (Nos. 1-7).

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,

Susan S. Masterton / CDW

Susan S. Masterton

Enclosure

RECEIVED & FILED

Sh

POSTMASTER: NO RECORDS

U.S. MAIL
FIRST CLASS PERMIT NO. 1000 TALLAHASSEE, FL 32301
POSTAGE WILL BE PAID BY ADDRESSEE

DOCUMENT NUMBER DATE

13154 DEC 17 8

FPSC-004 REGION CLERK

**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 17th day of December, 2003 to the following:

AT&T
Tracy Hatch
101 North Monroe Street, Suite
700
Tallahassee, FL 32301-1549

AT&T Communications of the
Southern States, LLC
Ms. Lisa A. Sapper
1200 Peachtree Street, N.E., Ste.
8100
Atlanta, GA 30309-3579

BellSouth Telecommunications,
Inc.
R. D. Lackey/M. Mays/N.
White/J. Meza
c/o Ms. Nancy H. Sims
150 South Monroe Street, Suite
400
Tallahassee, FL 32301-1556

Covad Communications
Company
Mr. Charles E. Watkins
1230 Peachtree Street, NE, 19th
Floor
Atlanta, GA 30309-3574

FDN Communications
Matthew Feil/Scott Kassman
390 North Orange Avenue, Suite
2000
Orlando, FL 32801-1640

Florida Cable
Telecommunications Assoc., Inc.
Michael A. Gross
246 E. 6th Avenue, Suite 100
Tallahassee, FL 32303

ITC DeltaCom
Nanette Edwards
4092 South Memorial Parkway
Huntsville, AL 35802

KMC Telecom III, LLC
Marva Brown Johnson, Esq.
1755 North Brown Road
Lawrenceville, GA 30043-8119

McWhirter Law Firm
Vicki Kaufman
117 S. Gadsden St.
Tallahassee, FL 32301

Messer Law Firm
Floyd Self
P.O. Box 1876
Tallahassee, FL 32302-1876

Verizon Florida Inc.
Richard Chapkis
P.O. Box 110, FLTC0717
Tampa, FL 33601-0110

Florida Public Service
Commission
Adam Tietzman
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Allegiance Telecom of Florida,
Inc.
Charles V. Gerkin, Jr.
9201 N. Central Expressway
Dallas, TX 75231

Allegiance Telecom, Inc.
Terry Larkin
700 East Butterfield Road
Lombard, IL 60148

Florida Competitive Carriers
Assoc.
c/o McWhirter Law Firm
Joseph McGlothlin/Vicki
Kaufman
117 S. Gadsden St.
Tallahassee, FL 32301

MCI WorldCom
Communications, Inc.(GA)
De O'Roark, Esq.
Six Concourse Parkway, Suite
3200
Atlanta, GA 30328

Xspedius Communications
Ms. Rabinai E. Carson
5555 Winghaven Blvd., Suite
300
O'Fallon, MO 63366-3868
Phone: (301) 361-4220

Granite Telecommunications,
LLC
Rand Currier/Geoff Cookman
234 Copeland Street
Quincy, MA 02169-4005

MCI WorldCom
Communications, Inc.
Ms. Donna C. McNulty
1203 Governors Square Blvd.,
Suite 201
Tallahassee, FL 32301-2960

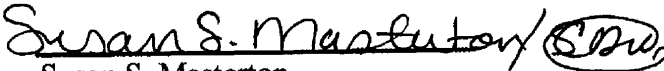
Miller Isar, Inc.
Andrew O. Isar
7901 Skansie Avenue, St. 240
Gig Harbor, WA 98335

NewSouth Communications
Jake E. Jennings
Regulatory Affairs & Carrier
Relations
Two N. Main Center
Greenville, SC 29601

Moyle, Flanigan, Katz Raymond
& Sheehan, P.A.
Jon C. Moyle, Jr., Esq.
The Perkins House
118 N. Gadsen St.
Tallahassee, FL 32301

Nuvox Communications, Inc.
Bo Russell, Vice-President
Regulatory & Legal Affairs
301 N. Main St.
Greenville, SC 29601

Messer Law Firm
Norman Horton
P.O. Box 1876
Tallahassee, FL 32302-1876


Susan S. Masterton

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: December 17, 2003
Route-Specific Review for DS1, DS3 and)
Dark Fiber Transport)
_____)

SPRINT-FLORIDA'S GENERAL AND SPECIFIC OBJECTIONS TO STAFF'S FIRST SET OF INTERROGATORIES (Nos. 1-14) AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (Nos. 1-7)

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 (hereinafter "Sprint-Florida") hereby submits the following General and Specific Objections to Staff of the Florida Public Service Commission's (Staff's) First Set of Interrogatories (Nos. 1-14) and First Request for Production of Documents (Nos. 1-7), which were served on Sprint-Florida by e-mail on December 10, 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-Florida prepares its responses to the above-referenced requests, Sprint-Florida reserves the right to supplement, revise, or modify its objections at the time that it serves its responses on Staff. Moreover, should Sprint-Florida determine that a Protective Order is necessary with respect to any of the material requested by Staff, Sprint-Florida 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.

DOCUMENT NUMBER-DATE

13154 DEC 17 8

FPSC-COMMISSION CLERK

GENERAL OBJECTIONS

Sprint-Florida makes the following General Objections to Staff's First Set of Interrogatories (Nos. 1-14) ("First IRR") and First Request for Production of Documents (Nos. 1-7) ("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-Florida's answers when they are served on Staff.

1. Sprint-Florida objects to the requests to the extent that such requests seek to impose an obligation on Sprint-Florida 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-Florida has interpreted Staff's requests to apply to Sprint-Florida'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-Florida objects to such request to produce as irrelevant, overly broad, unduly burdensome, and oppressive.

3. Sprint-Florida 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-Florida 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-Florida to Staff's requests will be provided subject to, and without waiver of, the foregoing objection.

5. Sprint-Florida 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-Florida will attempt to note in its responses each instance where this objection applies.

6. Sprint-Florida objects to Staff's discovery requests, instructions and definitions, insofar as they seek to impose obligation on Sprint-Florida that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

7. Sprint-Florida objects to providing information to the extent that such information is already in the public record before the Commission, or elsewhere.

8. Sprint-Florida objects to each and every request, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. Sprint-Florida 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-Florida 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-Florida is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, Sprint-Florida 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

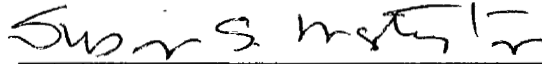
site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document will be provided in response to these discovery requests. Rather, Sprint-Florida's responses will provide, subject to any applicable objections, all of the information obtained by Sprint-Florida after a reasonable and diligent search conducted in connection with these requests. Sprint-Florida 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-Florida 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-Florida incorporates herein by reference its objections to that previous discovery.

SPECIFIC OBJECTIONS FIRST IRR AND FIRST POD

Interrogatories Nos. 1-14 and POD Nos. 1-7

OBJECTION: To the extent these Interrogatories and Requests appear to address information related to establishing a case for a finding of non-impairment for high capacity loops or transport, Sprint-Florida is not challenging the FCC's national finding of impairment for high capacity loops or transport and, therefore, Sprint-Florida objects to these Interrogatories and Requests on the basis that they request information that is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence. In addition, to the extent these Interrogatories and Requests are relevant only to establishing a finding of non-impairment and Sprint-Florida is not challenging the FCC's national finding of impairment, these Interrogatories and Requests are unduly burdensome, expensive, oppressive, or excessively time consuming for Sprint-Florida.

DATED this 17th day of December 2003.



SUSAN S. MASTERTON
P.O. Box 2214
Tallahassee, FL 32316-2214
(850) 599-1560 (phone)
(850) 878-0777 (fax)
susan.masterton@mail.sprint.com

ATTORNEY FOR SPRINT-FLORIDA