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December 18, 2003

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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Re: Docket Nos. 981834-TP and 990321-TP (Generic Collocation)

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of Verizon Florida Inc.'s Initial Objections to Staff's Thirteenth Set of Interrogatories and Thirteenth Request for Production of Documents, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,


Daniel McCuaig

cc: All Parties of Record
Charles Schubart

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**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of Competitive Carriers for Commission action to support local competition in BellSouth Telecommunications, Inc.'s service territory))))))	Docket No. 981834-TP
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Petition of ACI Corp. d/b/a Accelerated Connections, Inc. for generic investigation to ensure that BellSouth Telecommunications, Inc., Sprint-Florida, Incorporated, and GTE Florida Incorporated comply with obligation to provide alternative local exchange carriers with flexible, timely, and cost-efficient physical collocation))))))))))))	Docket No. 990321-TP Filed: December 18, 2003
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**VERIZON FLORIDA INC.'S INITIAL OBJECTIONS TO
STAFF'S THIRTEENTH SET OF INTERROGATORIES AND
THIRTEENTH REQUEST FOR PRODUCTION OF DOCUMENTS**

Verizon Florida Inc. ("Verizon FL"), pursuant to Rule 28-106.206 of the Florida Administrative Code and Rules 1.340 and 1.280 of the Florida Rules of Civil Procedure, hereby files the following Initial Objections to Staff's Tenth Set of Interrogatories and Tenth Request for Production of Documents, both served on Verizon FL via e-mail on July 22, 2003.

The objections stated herein are preliminary in nature and are made at this time to comply with the requirement set forth in Order No. PSC-02-1513-PCO-TP, issued on November 4, 2002 by the Florida Public Service Commission ("Commission"). Should additional grounds for objection be discovered as Verizon FL prepares its answers to

the above-referenced Interrogatories and Requests, Verizon FL reserves the right to supplement, revise, or modify its objections at the time it serves its responses.

GENERAL OBJECTIONS

1. Verizon FL objects to each Production Request and Interrogatory to the extent that it seeks to impose an obligation on Verizon FL to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such Interrogatory or Request is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. Verizon FL objects to each Production Request and Interrogatory to the extent that it is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission. Verizon FL objects to each such Interrogatory and Request as being irrelevant, overly broad, unduly burdensome, and oppressive.

3. Verizon FL objects to each Production Request and Interrogatory to the extent that it requests information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. Verizon FL objects to each Production Request and Interrogatory to the extent that it is vague, ambiguous, overly broad, imprecise, or to the extent that it utilizes terms that are subject to multiple interpretations and are not properly defined or explained for purposes of this discovery. Any answers provided by Verizon FL in response to these Interrogatories and Production Requests will be provided subject to, and without waiver of, the foregoing objection.

5. Verizon FL objects to each Production Request and Interrogatory to the extent that it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

6. Verizon FL objects to providing information to the extent that such information is already in the public record before the Commission.

7. Verizon FL objects to each Production Request and Interrogatory to the extent that it seeks to impose obligations on Verizon FL that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

8. Verizon FL objects to each Production Request and Interrogatory to the extent that responding to it would be unduly burdensome, expensive, oppressive, or excessively time consuming.

9. Verizon FL objects to each Production Request and Interrogatory to the extent that it is not limited to any stated period of time and, therefore, is overly broad and unduly burdensome.

10. Verizon is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, Verizon 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. Verizon FL will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the Production Requests or

Interrogatories purport to require more, Verizon FL objects on the grounds that compliance would impose an undue burden or expense.

INITIAL SPECIFIC OBJECTIONS: THIRTEENTH DOCUMENT REQUESTS

In addition to the foregoing general objections, Verizon FL raises the following initial specific objections to the following individual document production requests in Staff's Thirteenth Request for Production of Documents:

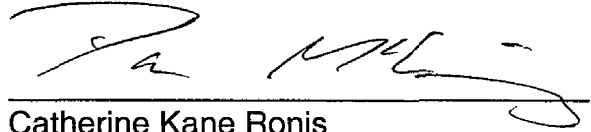
105. Please provide the Securities and Exchange Commission report for Verizon Florida for September 30, 2003.

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Document Request on the grounds that it seeks material that is publicly available. Verizon FL's 10Q for the period ended September 30, 2003 can be obtained from the SEC's EDGAR database at <http://www.sec.gov/>.

109. Please provide copies of all reports, reviews, and analyses regarding the impact of the FCC's Triennial Review Order issued August 1, 2003.

Objection: In addition to its General Objections, which are incorporated herein by reference, Verizon FL objects to this Document Request on the grounds that the request for "all reports, reviews, or analyses" regarding the "impact" of the FCC's Triennial Review Order is overly broad and unreasonably vague. Furthermore, any such internal analyses would be irrelevant to this proceeding. If such materials exist, Verizon FL further objects to this Document Request to the extent it seeks materials protected by the attorney-client privilege, the attorney work product privilege, or any other privilege.

Respectfully submitted,



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Dated: December 18, 2003

Attorneys for Verizon Florida Inc.

CERTIFICATE OF SERVICE
Docket No. 981834-TP and 990321-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via e-mail this 18th day of December, 2003 to the following (with service via FedEx or regular U.S. Mail to follow).

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C. Lee Fordham, Staff Counsel
Adam Teitzman, Staff Counsel
Andrew Maurey; Betty Gardner
Cheryl Bulecza-Banks
David Dowds
Jackie Schindler
Jason-Earl Brown
Laura King; Bob Casey
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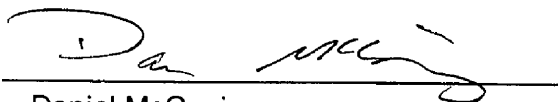
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