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Telephone: (850) 402-0510
Fax: (850) 402-0522
www.supratelecom.com

1311 Executive Center Drive, Suite 220
Tallahassee, FL 32301-5027

December 29, 2003

Mrs. Blanca Bayo, Director
Division of Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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**RE: Docket No. 030851-TP -
SUPRA'S OBJECTIONS TO STAFF'S THIRD SETS OF
INTERROGATORIES AND REQUEST FOR PRODUCTION OF
DOCUMENTS**

Dear Mrs. Bayo:

Supra Telecommunications and Information Systems, Inc.'s (Supra) Notice of Service of its objections to Staff's Third Sets Of Interrogatories and Request for Production of Documents to be filed in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return it to me.

Sincerely,

RECEIVED & FILED
Jh
FPSC-BUREAU OF RECORDS

Jorge Cruz-Bustillo/LWA
Jorge Cruz-Bustillo
Assistant General Counsel

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CERTIFICATE OF SERVICE

Docket No. 030851-TP

I HEREBY CERTIFY that a true and correct copy of the following was served via E-mail, Hand Delivery, Facsimile, and/or U.S. Mail this 29th day of December 2003 to the following:

Jeremy Susac
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

AT&T
Tracy Hatch *
101 North Monroe Street, Suite 700
Tallahassee, FL 32301-1549
Phone: (850) 425-6364
Fax: 425-6361

AT&T Communications of the Southern States, LLC
Ms. Lisa A. Sapper *
1200 Peachtree Street, N.E., Ste. 8100
Atlanta, GA 30309-3579
Phone: (404) 810-7812
Fax: (832) 213-0268
Email: lisariley@att.com

Access Integrated Networks, Inc.
Mr. Mark A. Ozanick *
4885 Riverside Drive, Suite 107
Macon, GA 31210-1148
Phone: (478) 475-9800
Fax: (478) 475-9988
Email: mark.ozanick@accesscomm.com

Allegiance Telecom of Florida, Inc.
Theresa P. Larkin/Jeffrey J. Binder *
700 East Butterfield Road, Suite 400
Lombard, IL 60148-5671
Phone: (630) 522-5463
Fax: (630) 522-5201
Email: terry.larkin@algx.com

Allegiance Telecom, Inc.
Terry Larkin *
700 East Butterfield Road
Lombard, IL 60148
Phone: 630-522-6453
Email: terry.larkin@algx.com

BellSouth BSE, Inc.
Mr. Mario L. Soto *
North Terraces Building
400 Perimeter Center Terrace, #400
Atlanta, GA 30346-1231
Phone: (678) 443-3937
Fax: (678) 443-3470
Email: mario.soto@bellsouth.com

BellSouth Telecommunications, Inc.
R.Lackey/M.Mays/N.White/J.Meza/A.Shore *
c/o Ms. Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556
Phone: (850) 224-7798
Fax: 222-8640
Email: nancy.sims@bellsouth.com

Comm South Companies, Inc.
Sheri Pringle *
P.O. Box 570159
Dallas, TX 75357-9900
Phone: (214) 355-7005
Fax: (214) 355-7259
Email: springle@commsouth.net

Covad Communications Company
Mr. Charles E. Watkins *
1230 Peachtree Street, NE, 19th Floor
Atlanta, GA 30309-3574
Phone: (404) 942-3492
Fax: (404) 942-3495
Email: gwatkins@covad.com

Firstmile Technologies, LLC
Michael Farmer *
750 Liberty Drive
Westfield, IN 46074-8844
Phone: (317) 569-2808
Fax: (317) 569-2805
Email: mfarmer@gotown.net

Florida Cable Telecommunications Assoc., Inc.
Michael A. Gross *
246 E. 6th Avenue, Suite 100
Tallahassee, FL 32303
Phone: 850-681-1990
Fax: 681-9676
Email: mgross@fcta.com

Florida Competitive Carriers Assoc.
c/o McWhirter Law Firm
Joseph McGlothlin/Vicki Kaufman *
117 S. Gadsden St.
Tallahassee, FL 32301
Phone: 850-222-2525
Fax: 222-5606
Email: jmcglothlin@mac-law.com/vkaufman@mac-law.com

Granite Telecommunications, LLC
Rand Currier/Geoff Cookman *
234 Copeland Street
Quincy, MA 02169-4005
Phone: (617) 847-1500
Fax: (617) 847-0931
Email: rcurrier@granitenet.com

ITC^DeltaCom
Nanette Edwards *
4092 South Memorial Parkway
Huntsville, AL 35802
Phone: (256) 382-3856

KMC Telecom III, LLC
Marva Brown Johnson, Esq. *
1755 North Brown Road
Lawrenceville, GA 30043-8119
Phone: (678) 985-6261
Fax: (678) 985-6213
Email: marva.johnson@kmctelecom.com

MCI WorldCom Communications, Inc.
Ms. Donna C. McNulty *
1203 Governors Square Blvd., Suite 201
Tallahassee, FL 32301-2960
Phone: (850) 219-1008
Fax: 219-1018
Email: donna.mcnulty@wcom.com

MCI WorldCom Communications, Inc. (GA)
De O'Roark, Esq. *
Six Concourse Parkway, Suite 600
Atlanta, GA 30328
Email: de.oroark@wcom.com

McWhirter Law Firm
Vicki Kaufman *
117 S. Gadsden St.
Tallahassee, FL 32301
Phone: 850-222-2525
Fax: 222-5606
Email: vkaufman@mac-law.com

Messer Law Firm
Floyd Self/Norman Horton *
P.O. Box 1876
Tallahassee, FL 32302-1876
Phone: 850-222-0720
Fax: 224-4359

Miller Isar, Inc.
Andrew O. Isar *
7901 Skansie Avenue, St. 240
Gig Harbor, WA 98335
Phone: (253) 851-6700
Fax: (253) 851-6474
Email: aisar@millerisar.com

Moyle Law Firm (Tall)
Jon Moyle, Jr. *
The Perkins House
118 North Gadsden Street
Tallahassee, FL 32301
Phone: (850) 681-3828
Fax: 681-8788
Email: jmoylejr@moylelaw.com

NOW Communications, Inc.
Mr. R. Scott Seab *
711 South Tejon Street, Suite 201
Colorado Springs, CO 80903-4054
Phone: (719) 633-3059
Fax: (719) 623-0287
Email: rss@nowcommunications.com

NewSouth Communications Corp.
Jake E. Jennings *
Two North Main Center
Greenville, SC 29601-2719
Phone: (864) 672-5877
Fax: (864) 672-5313
Email: jejennings@newsouth.com

Phone Club Corporation
Carlos Jordan *
168 S.E. 1st Street, Suite 705
Miami, FL 33131-1423
Phone: (786) 777-0079
Fax: (786) 777-0810
Email: phoneclubcorp@aol.com

Sprint-Florida/Sprint Communications Company
Susan Masterton *
P. O. Box 2214
Tallahassee, FL 32316-2214
Phone: (850) 599-1560
Fax: 878-0777
Email: susan.masterton@mail.sprint.com

Supra Telecommunications & Information Systems, Inc. (Mia)
Jorge Cruz-Bustillo, Esq. *
2620 S.W. 27th Avenue
Miami, FL 33133-3005
Phone: 305-476-4252
Fax: 305-443-1078
Email: Jorge.cruz-bustillo@stis.com

Tier 3 Communications
Kim Brown *
2235 First Street, Suite 217
Ft. Myers, FL 33901-2981
Phone: (239) 689-0000
Fax: (239) 689-0001
Email: steve@tier3communications.net

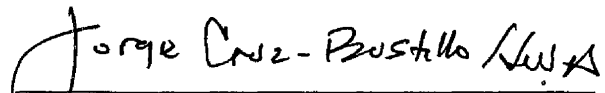
Universal Telecom, Inc.
Jennifer Hart *
P. O. Box 679
LaGrange, KY 40031-0679
Phone: (502) 222-9004
Fax: (800) 217-7158
Email: Jenniferh@universaltelecominc.com

Verizon Florida Inc.
Richard Chapkis/Kimberly Caswell *
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110
Phone: (813) 483-1256
Fax: (813) 273-9825
Email: richard.chapkis@verizon.com

Xspedius Communications
Ms. Rabinai E. Carson *
5555 Wingham Blvd., Suite 300
O'Fallon, MO 63366-3868
Phone: (301) 361-4220
Fax: (301) 361-4277
Email: rabinai.carson@xspedius.com

* Served electronically – via e-mail.

SUPRA TELECOMMUNICATIONS
& INFORMATION SYSTEMS, INC.
2620 S. W. 27th Avenue
Miami, FL 33133
Telephone: 305/ 476-4252
Facsimile: 305/ 443-1078


By: Jorge Cruz-Bustillo

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements Arising)	
from Federal Communications Commission)	Docket No. 030851-TP
Triennial UNE review: Local Circuit Switching)	
For Mass Market Customers)	Filed: December 29, 2003
)	

**SUPRA TELECOMMUNICATIONS AND INFORMATION SYSTEMS, INC.'S
OBJECTIONS TO STAFF'S THIRD SETS OF INTERROGATORIES (11-23)
AND REQUEST FOR PRODUCTION OF DOCUMENTS (10-14)**

Pursuant to the *Order Establishing Procedure*, Order No. PSC-03-1054-PCO-TP, issued September 22, 2003 ("*Procedural Order*"), Rule 28-106.206 of the Florida Administrative Code, and Rules 1.280 and 1.340 of the Florida Rules of Civil Procedure, Supra hereby files its preliminary objections to Staff of the Florida Public Service Commission's ("Staff") Third Sets of Interrogatories and Request for Production of Documents ("Set of Discoveries") that were propounded by Staff on December 24, 2003.

Supra files these objections to comply with the seven (7) day requirement set forth in the *Procedural Order*. These objections are preliminary in nature. Should additional grounds for objection be discovered as Supra prepares its responses to any discovery, Supra reserves the right to supplement these objections.

GENERAL OBJECTIONS

Supra makes the following general objections to this Set of Discoveries which will be incorporated by reference into Supra's specific responses when Supra responds to these Interrogatories.

1. Supra objects to the "Definitions" section, the "General Instructions," and the individual discovery items of Staff's Third Sets of Interrogatories and Request for Production of

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Documents to Supra to the extent that they are overly broad, unduly burdensome, and/or oppressive.

2. Supra objects to the “Definitions,” the “General Instructions,” and the individual discovery items to the extent they are irrelevant and not likely to lead to the discovery of admissible evidence.
3. Supra objects to the Set of Discoveries to the extent they seek to discover information that is inconsistent with or unrelated to the parameters and methodology of the impairment analysis prescribed in the Triennial Review Order.
4. Supra objects to the “Definitions,” the “General Instructions,” and the discovery items to the extent they are vague, ambiguous, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these discoveries.
5. Supra objects to the “General Instructions” and the discovery items of Staff’s Third Sets of Interrogatories and Request for Production of Documents to Supra to the extent that they purport to impose discovery obligations on Supra that exceed the scope of discovery allowed by the applicable Florida Rules of Civil Procedure.
6. Supra objects to the “General Instructions” section and the individual discovery items of Staff’s Third Sets of Interrogatories and Request for Production of Documents to Supra to the extent that the “instructions” purport to seek disclosure of “all” documents, materials or information in Supra’s possession. Supra’s responses will provide all nonprivileged and otherwise discoverable information obtained by Supra after a reasonable and diligent search conducted in connection with the discoveries. Such search will include a review of only those files that are reasonably expected to contain the

discovery documents and/or information. To the extent that “instructions” or individual discoveries require more, Supra objects on the ground that compliance would be unduly burdensome, expensive, oppressive, or excessively time consuming, and unnecessary to accomplish BellSouth’s legitimate discovery needs.

7. Supra objects to Staff’s Third Sets of Interrogatories and Request for Production of Documents to Supra to the extent that the Set of Discoveries seek discovery of materials and/or information protected by attorney/client privilege, the work product doctrine, the accountant/client privilege, or any other applicable privilege.
8. Supra objects to Staff’s Third Sets of Interrogatories and Request for Production of Documents to Supra to the extent that the discoveries would require disclosure of information that constitutes trade secrets and/or proprietary confidential information and therefore should either not be disclosed at all or should be disclosed only pursuant to the terms of a confidentiality agreement.
9. Supra objects to all discoveries which would require the production of materials and/or information which is already in Staff’s possession or is in the public record before the Commission. To duplicate information that Staff already has or is readily available to Staff would be unduly burdensome and oppressive.
10. Supra objects to Staff’s Third Sets of Interrogatories and Request for Production of Documents to the extent Staff seeks to impose an obligation on Supra to respond on behalf of subsidiaries and/or former officers, employees, agents, and directors on the grounds that such discoveries for production are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

11. Supra is a small corporation that does not have every work function spelled out and with all the smallest details being tracked as other larger corporations would do. Thus, it is possible that a good number of the information that Staff may be seeking is not information that Supra currently tracks, monitors, uses, or readily has. Supra will conduct a search of its files and/or systems that are reasonably expected to contain the requested information. To the extent that Staff's Third Sets of Discoveries purport to require more, Supra objects on the grounds that compliance would impose an undue burden or expense on Supra.