

ORIGINAL



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December 31, 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

RECEIVED-FPSC
03 DEC 31 PM 4:00
COMMISSION
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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 Objections and Requests for Clarification to Staff's Third Set of Interrogatories (Nos. 18-52) and Third Request for Production of Documents (Nos. 18-23).

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 850/599-1560.

RECEIVED & FILED

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FPSC-BUREAU OF RECORDS

Sincerely,

Susan S. Masterton

Susan S. Masterton

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Enclosure

DOCUMENT NUMBER 030851-TP

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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 31st day of December, 2003 to the following:

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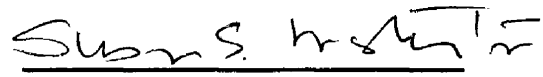
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Susan S. Masterton

(+ Signed Protective Agreement)

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)	
For Mass Market Customers)	Filed: December 31, 2003
_____)		

**SPRINT-FLORIDA’S OBJECTIONS AND REQUESTS FOR CLARIFICATION TO
STAFF’S THIRD SET OF INTERROGATORIES (Nos. 18-52) AND THIRD REQUEST
FOR PRODUCTION OF DOCUMENTS (Nos. 18-23)**

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 Objections and Requests for Clarification to Staff of the Florida Public Service Commission’s (Staff’s) Third Set of Interrogatories (Nos.18-52) and Third Request for Production of Documents (Nos. 18-23), which were served on Sprint-Florida by e-mail on December 24, 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

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GENERAL OBJECTIONS

Sprint-Florida makes the following General Objections to Staff's Third Set of Interrogatories (Nos. 18-52) ("Third IRR") and Third Request for Production of Documents (Nos. 18-23) ("Third POD"). These general objections apply to each of the individual requests and interrogatories in the Third IRR and Third 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 Staff 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 REQUESTS FOR CLARIFICATION

POD No. 19. Please provide all documents and work papers that support your response to Interrogatory No. 3 (c).

Sprint requests clarification of this request, as Sprint has previously responded to a request for documents supporting Interrogatory No. 3(c) in Sprint's Responses to Staff's First Request for Production of Documents No. 5. Sprint questions whether the designated number of the Interrogatory is in error.

POD No. 20. Please provide all documents that support your response to Interrogatory No. 4.

Sprint requests clarification of this request, as Sprint has previously responded to a request for documents supporting Interrogatory No. 4 in Sprint's Responses to Staff's First Request for Production of Documents Nos. 8 & 9. Sprint questions whether the designated number of the Interrogatory is in error.

POD NO. 21. Please provide all documents that support your response to Interrogatory No. 5(a).

Sprint requests clarification of this request, as Sprint has previously responded to a request for documents supporting Interrogatory No. 5(a) in Sprint's Responses to Staff's First Request for Production of Documents No. 10. Sprint questions whether the designated number of the Interrogatory is in error.

DATED this 31st day of December 2003.



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