



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

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

ORIGINAL

January 15, 2004

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

RECEIVED-FPSC  
04 JAN 15 PM 3:17  
COMMISSION  
CLERK

**RE: Docket No. 030851-TP -  
SUPRA'S OBJECTIONS TO STAFF'S FOURTH 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 Fourth 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,

*Jorge Cruz-Bustillo / JWB*  
Jorge Cruz-Bustillo  
Assistant General Counsel

RECEIVED & FILED  
*Oh*  
FPSC-BUREAU OF RECORDS

AUS \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL \_\_\_\_\_  
OPC \_\_\_\_\_  
MMS \_\_\_\_\_  
SEC   1    
OTH \_\_\_\_\_

DOCUMENT NUMBER-DATE

00633 JAN 15 04

FPSC-COMMISSION CLERK

**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 15<sup>th</sup> day of January 2004 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](mailto: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](mailto: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](mailto: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](mailto: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](mailto: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](mailto: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](mailto: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](mailto: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](mailto: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](mailto: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](mailto:jmcglothlin@mac-law.com)/[vkaufman@mac-law.com](mailto: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](mailto: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](mailto: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.mculty@wcom.com](mailto:donna.mculty@wcom.com)

*MCI WorldCom Communications, Inc.(GA)*

**De O'Roark, Esq. \***

Six Concourse Parkway, Suite 600

Atlanta, GA 30328

Email: [de.oroark@wcom.com](mailto: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](mailto: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](mailto: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](mailto: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](mailto: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](mailto: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](mailto: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](mailto: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](mailto: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](mailto: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](mailto:Jenniferh@universaltelecominc.com)*

*Verizon Florida Inc.*

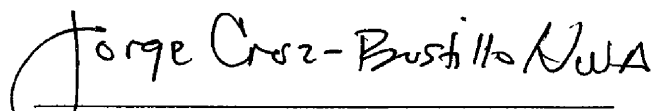
**Richard Chapkis/Kimberly Caswell \***  
*P.O. Box 110, FLTC0007  
Tampa, FL 33601-0110  
Phone: (813) 483-1256  
Fax: (813) 273-9825  
Email: [richard.chapkis@verizon.com](mailto:richard.chapkis@verizon.com)*

*Xspedius Communications*

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

*\* Served electronically – via e-mail.*

**SUPRA TELECOMMUNICATIONS  
& INFORMATION SYSTEMS, INC.**  
2620 S. W. 27<sup>th</sup> 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: January 15, 2004
_____		

**SUPRA TELECOMMUNICATIONS AND INFORMATION SYSTEMS, INC.'S  
OBJECTIONS TO STAFF'S FOURTH SETS OF INTERROGATORIES (24-45)  
AND REQUEST FOR PRODUCTION OF DOCUMENTS (15-23)**

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 January 8, 2004.

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 this Set of Discoveries.

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

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 Fourth 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 Fourth 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 Fourth 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 Fourth 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 Fourth 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 Fourth Sets of Discoveries purport to require more, Supra objects on the grounds that compliance would impose an undue burden or expense on Supra.