

ORIGINAL
AUSLEY & McMULLEN

ATTORNEYS AND COUNSELORS AT LAW

227 SOUTH CALHOUN STREET
P.O. BOX 391 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
(850) 224-9115 FAX (850) 222-7560

January 28, 2004

VIA HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of the Commission
Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0870

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ON JAN 28 PM 3:30
COMMISSION
CLERK

Re: Docket No. 030852-TP

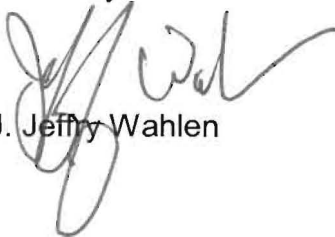
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Preliminary Objections to BellSouth's First Request for Admissions (Nos. 1-3), First Interrogatories (Nos. 4-7) and Second Request for Production of Documents (Nos. 3) filed on behalf of Sprint-Florida, Inc. and Sprint Communications Company Limited Partnership.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,


J. Jeffrey Wahlen

RECEIVED & FILED


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OTH _____

Enclosures

cc: All Parties of Record

DOCUMENT NUMBER-DATE

01265 JAN 28 3

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising from Federal Communications Commission's triennial UNE Review: Location-Specific Review for DS1, DS3 and Dark Fiber Loops, and Route-Specific Review for DS1, DS3 and Dark Fiber Transport.

DOCKET NO. 030852-TP
Filed: January 28, 2004

**PRELIMINARY OBJECTIONS OF SPRINT-FLORIDA, INC. AND
SPRINT COMMUNICATIONS COMPANY L.P.
TO BELL SOUTH'S FIRST REQUEST FOR
ADMISSIONS (NOS. 1-3), FIRST INTERROGATORIES (NOS. 4-7) AND
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (No. 3)**

Sprint-Florida, Inc. and Sprint Communications Company, L.P., ("Sprint") pursuant to Order No. PSC-03-1055-PCO-TP, issued September 22, 2003, Rule 28-106.206, Florida Administrative Code, and Rules 1.280, 1.340, 1.350, and 1.370, Florida Rules of Civil Procedure, hereby submit the following Preliminary Objections to BellSouth's First Request for Admissions (Nos. 1-3), First Interrogatories (Nos. 4-7) and Second Request for Production of Documents (No. 3), served on January 21, 2004 (collectively, "Discovery Requests").

I. INTRODUCTION

These objections are preliminary in nature and are made for the purpose of complying with the seven (7) day requirement set forth in Order No. PSC-03-1055-PCO-TP, issued by the Florida Public Service Commission ("Commission") in this proceeding on September 22, 2003. Should additional grounds for Objections be discovered as Sprint prepares its answers to any Interrogatories, Sprint reserves the right to supplement, revise, or modify these Preliminary Objections at the time that Sprint provides its responses to the answers to the Discovery Requests. Moreover, should

Sprint determine that a Protective Order is necessary with respect to any of the material requested by BellSouth, Sprint reserves the right to file a motion with the Commission seeking such an order at the time that it serves its answers and responses on BellSouth.

II. GENERAL OBJECTIONS.

Sprint makes the following General Objections to the Discovery Requests, which general objections will be incorporated by reference into Sprint's specific responses and answers, where provided, when Sprint responds and answers.

1. Sprint objects to the Definition of "Sprint," in paragraph 3 of the Definitions section to the extent that such Definition seeks to impose an obligation on Sprint to respond on behalf of subsidiaries, affiliates, or other persons which are not parties to this proceeding on the grounds that such Definition is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. Without waiving this General Objection, and subject to other general and specific Objections, where provided, answers will be provided on behalf of Sprint-Florida, Incorporated and Sprint Communications Company Limited Partnership, which are the certificated carriers authorized to provide regulated telecommunications services in Florida, and which are parties to this proceeding, relative, however, only to their intrastate operations in Florida.

2. Sprint objects to each and every request for admission, interrogatory and request to produce in the Discovery Request and the Instructions therein to the extent they seek information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

3. Sprint objects to each and every request for admission, interrogatory and request to produce in the Discovery Request and the Instructions insofar as they are 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 Interrogatories. Where provided, answers provided by Sprint to BellSouth's Discovery Requests will be provided subject to, and without waiving, this General Objection.

4. Sprint objects to each and every request for admission, interrogatory and request to produce in the Discovery Request and the Instructions insofar as they are not reasonably calculated to lead to the discovery of admissible evidence and are not relevant to the subject matter of this proceeding.

5. Sprint objects to each and every request for admission, interrogatory and request to produce in the Discovery Request and the Instructions to the extent they seek to impose obligations on Sprint that exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

6. Sprint objects to answering any request for admission, interrogatory and request to produce in the Discovery Request and the Instructions to the extent such Interrogatory seeks responsive information already in the public domain, or otherwise on record with the Commission or the Federal Communications Commission ("FCC").

7. Sprint objects to each request for admission, interrogatory and request to produce in the Discovery Request and the Instructions to which it is unduly burdensome, expensive, oppressive, or excessively time consuming for response thereto as written.

8. Sprint objects to each Interrogatory to the extent such Interrogatory seeks responsive information that constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes and/or "proprietary confidential business information" within the meaning of Section 364.183(3), Fla. Stat. To the extent any Interrogatory seeks proprietary business information that is not subject to a "trade secrets" privilege, and Sprint makes such responsive information available to BellSouth, Sprint only will make responsive information available to counsel for Sprint pursuant to an appropriate Protective Agreement, and subject to any requirements of the Commission relative to protecting such proprietary business information.

9. Sprint is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, Sprint creates numerous documents that are not subject to either Commission or FCC retention of records requirements. These documents are kept in numerous locations and are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is impossible for Sprint to affirm that every responsive document in existence has been provided in response to an Interrogatory. Instead, where provided, Sprint's responses will provide all of the information obtained by Sprint after a reasonable and diligent search conducted in connection with the Interrogatory. Such search will include only a review of those files that are reasonably expected to contain the requested information. To the extent that the discovery request purports to require more, Sprint objects on the ground that compliance would be unduly burdensome.

III. SPECIFIC OBJECTIONS.

1. Sprint hereby asserts each of its General Objections as to each of the individual requests for admission, interrogatories and request to produce in the Discovery Request propounded to Sprint.

2. Sprint objects to Interrogatory No. 6 on grounds that the term "southeastern states" contained therein causes the interrogatory to be overbroad, burdensome and seek information that is not relevant or calculated to lead to the discovery of admissible evidence in this case. Specifically, Sprint objects to the interrogatory to the extent that it calls for information about Sprint's operations in states other than Florida. Without waiving its general objections or this specific objection, Sprint will answer Interrogatory No. 6 as it relates to Florida.

DATED this 28th day of January, 2004.



J. JEFFRY WAHLEN
Ausley & McMullen
P. O. Box 391
Tallahassee, Florida 32302
(850) 425-5471
(850) 222-7560 (fax)
jwahlen@ausley.com

ATTORNEYS FOR SPRINT-FLORIDA, INC.
and SPRINT COMMUNICATIONS COMPANY
LIMITED PARTNERSHIP

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished via Electronic Mail, U. S. Mail or Hand Delivery (*) 28th day of January, 2004, to the following:

Adam Teitzman *
Beth Keating *
Division of Legal Services
Florida Public Service Comm.
Division of Legal Services
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
Phone: (850) 413-6212
Fax: (850) 413-6250
ateitzman@psc.state.fl.us
bkeating@psc.state.fl.us

Lisa A. Sapper
AT&T
1200 Peachtree Street, N.E., Ste. 8100
Atlanta, GA 30309-3579
Phone: (404) 810-7812
lisariley@att.com

Terry Larkin
Allegiance Telecom, Inc.
700 East Butterfield Road, Ste. 400
Lombard, IL 60148
Phone: (630) 522-6453
terry.larkin@algx.com

Bill Magness
Casey & Gentz, L.L.P.
919 Congress Avenue, Suite 1060
Austin, TX 78701
Phone: (512) 225-0019
Fax: (512) 480-9200

Tracy Hatch
AT&T
101 North Monroe Street, Suite 700
Tallahassee, FL 32301-1549
Phone: (850) 425-6364
thatch@att.com

Charles V. Gerkin, Jr.
Regulatory Counsel
Allegiance Telecom, Inc.
9201 North Central Expressway
Dallas, TX 75231
Phone: (469) 259-4051
Fax: (770) 234-5945
Cell: (770) 855-0466
charles.gerkin@algx.com

Nancy H. Sims
Nancy White
Doug Lackey
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556
Phone: (850) 224-7798
Fax: (850) 222-8640
nancy.sims@bellsouth.com

Charles E. Watkins
Covad
1230 Peachtree Street, NE, 19th Floor
Atlanta, GA 30309-3574
Phone: (404) 942-3492
Fax: (404) 492-3495
gwatkins@covad.com
jbelle@covad.com

Matthew Feil
Scott Kassman
FDN Communications
390 North Orange Avenue, Suite 2000
Orlando, FL 32801-1640
Phone: (407) 835-0460
Fax: (407) 835-0309
mfeil@mail.fdn.com
skassman@mail.fdn.com

Nanette Edwards
Director – Regulatory
ITC^Delta Com
4092 South Memorial Parkway
Huntsville, AL 35802
Phone: (256) 382-3856
nedwards@itcdeltacom.com

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

Floyd Self
Norman H. Horton
Messer, Caparello & Self
ITC DeltaCom
MCI
KMC
Xspedius
215 South Monroe Street, Suite 701
Tallahassee, FL 32301
fself@lawfla.com
nhorton@lawfla.com

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

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Kaufman & Arnold P.A.
FCCA
117 S. Gadsden Street
Tallahassee, FL 32301
jmcglothlin@mac-law.com
vkaufman@mac-law.com

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

De O'Roark
MCI WorldCom Communications, Inc. (GA)
Six Concourse Parkway, Suite 3200
Atlanta, GA 30328
de.oroark@mci.com

Jon Moyle, Jr.
Moyle Law Firm
NuVox Communications, Inc.
The Perkins House
118 North Gadsden Street
Tallahassee, FL 32301
Phone: (850) 681-3828
Fax: (850) 681-8788
jmoylejr@moylslaw.com

Bo Russell
NuVox Communications, Inc.
301 North Main Street
Greenville, SC 29601-2171
Phone: (864) 331-7323
brussell@nuvox.com

Richard Chapkis
Kimberly Caswell
Verizon Florida, Inc.
One Tampa City Center
201 North Franklin Street (33602)
P. O. Box 110, FLTC0007
Tampa, FL 33601-0110
Phone: (813) 483-2606
Fax: (813) 204-8870
Richard.chapkis@verizon.com

Michael A. Gross
VP Reg. Affairs & Reg. Counsel
Florida Cable Telecom. Association
246 East 6th Avenue, Suite 100
Tallahassee, FL 32303
Phone: (850) 681-1990
Fax: (850) 681-9676
mgross@fcta.com

Jean Houck
Business Telecom, Inc.
4300 Six Forks Road
Raleigh, NC 27609
Phone: (919) 863-7325
jean.houck@btitelecom.com

Jonathan Audu
Manager, Regulatory Affairs
Supra Telecommunications
1311 Executive Center Drive, Suite 220
Tallahassee, FL 32301-5027
Phone: (850) 402-0510
Fax: (850) 402-0522
jonathan.audu@stis.com

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

Susan S. Masterton
Sprint-Florida, Inc.
Sprint Communications Co. L.P.
1313 Blair Stone Road
P. O. Box 2214
Tallahassee, FL 32316-2214
Phone: (850) 599-1560
Fax: (850) 878-0777
susan.masterton@mail.sprint.com

Jorge Cruz-Bustillo
Assistant General Counsel
Supra Telecommunications
2620 S.W. 27th Avenue
Miami, FL 33133
Phone: (305) 476-4252
Fax: (305) 443-1078
Jorge.cruz-bustillo@stis.com

Charles Beck
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison St., Rm. 812
Tallahassee, FL 32399-1400
Phone: (850) 488-9330
beck.charles@leg.state.fl.us

