

ORIGINAL

MCWHIRTER REEVES
ATTORNEYS AT LAW

TAMPA OFFICE:
400 NORTH TAMPA STREET, SUITE 2450
TAMPA, FLORIDA 33602
P. O. BOX 3350 TAMPA, FL 33601-3350
(813) 224-0866 (813) 221-1854 FAX

PLEASE REPLY TO:

TALLAHASSEE

TALLAHASSEE OFFICE:
117 SOUTH GADSDEN
TALLAHASSEE, FLORIDA 32301
(850) 222-2525
(850) 222-5606 FAX

February 9, 2004

VIA HAND DELIVERY

Blanca S. Bayo, Director
Division of Records and Reporting
Betty Easley Conference Center
4075 Esplanade Way
Tallahassee, Florida 32399-0870

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COMMISSION
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Re: Docket No.: 030851-TP

Dear Ms. Bayo:

On behalf of the Florida Competitive Carriers Association (FCCA) enclosed for filing and distribution are the original and 15 copies of the following:

- ▶ Objections of the Florida Competitive Carriers Association to Staff's Fifth Set of Interrogatories (Nos. 48-61)

Please acknowledge receipt of the above on the extra copy of and return the stamped copies to me. Thank you for your assistance.

Sincerely,

Vicki Gordon Kaufman
Vicki Gordon Kaufman

Enclosures

AUS	_____
CAF	_____
CMP	_____
COM	_____
CTR	_____
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GCL	_____
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DOCUMENT NUMBER-DAT

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MCWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, KAUFMAN & ARNOLD, P.A.

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising
From Federal Communications Commission
Triennial UNE review: Local Circuit Switching
For Mass Market Customers

Docket No. 030851-TP
Filed: February 9, 2004

**FLORIDA COMPETITIVE CARRIERS ASSOCIATION'S
OBJECTIONS TO STAFF'S FIFTH SET OF INTERROGATORIES (NOS. 48 - 61)**

The Florida Competitive Carriers Association (FCCA), pursuant to Rules 1.280, 1.340, Florida Rules of Civil Procedure, and Rule 28.106-206, Florida Administrative Code, hereby files the following General Objections Staff's Fifth Set of Interrogatories (Nos. 48 - 61).

GENERAL OBJECTIONS

1. The FCCA objects to the interrogatories to the extent they seek to impose an obligation on the FCCA to respond on behalf of persons that are not parties to this case on the grounds that such interrogatories are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. The FCCA objects to the interrogatories to the extent they are intended to apply to matters other than those subject to the jurisdiction of the Commission. The FCCA objects to such interrogatories as being irrelevant, overly broad, unduly burdensome, and oppressive.

3. The FCCA objects to each and every interrogatory 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. The FCCA objects to each and every interrogatory insofar as the interrogatories are vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these interrogatories.

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FPSC-COMMISSION CLERK

Any answers provided by the FCCA in response to the interrogatories will be provided subject to, and without waiver, of the foregoing objection.

5. The FCCA objects to each and every interrogatory insofar as it is not relevant to the subject matter of this action and is not reasonably calculated to lead to the discovery of admissible evidence. The FCCA will attempt to note in its responses each instance where this objection applies.

6. The FCCA objects to providing information to the extent that such information is already in the public record before the Commission or in Staff's possession.

7. The FCCA objects to Staff's discovery requests, instructions and definitions, insofar as they seek to impose obligations on the FCCA that exceed the requirements of the Florida Rules of Civil Procedure and Florida Law.

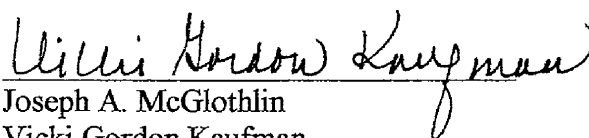
8. The FCCA objects to each and every interrogatory insofar as any of them are unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. The FCCA objects to each and every interrogatory to the extent that the interrogatories would require disclosure of information that constitutes "trade secrets" pursuant to Section 90.506 and/or proprietary confidential business information.

10. The FCCA objects to any discovery request that seeks to obtain "all" of particular documents, items, or information to the extent that such requests are overly broad and unduly burdensome. Any answers provided by the FCCA in response to this discovery will be provided subject to, and without waiver of, the foregoing objection.

11. The FCCA objects to any discovery request that is not limited in time or is not limited to a period of time that is relevant to the issues before the Commission and/or reasonably related to Staff's legitimate discovery needs.

12. The FCCA objects to any discovery request that would require the FCCA to seek information not in its possession or control or create documents for the purpose of responding to the interrogatories insofar as such requests seek to impose obligations on the FCCA that exceed the requirements of the Florida Rules of Civil Procedure and Florida Law.



Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin, Davidson,
Kaufman & Arnold, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301
(850) 222-2525
(850) 222-5606 (fax)
jmclothlin@mac-law.com

Attorneys for Florida Competitive Carriers
Association

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing the Florida Competitive Carriers Association's Objections to Staff's Fifth Set of Interrogatories (Nos. 48 - 61) has been provided by (*) hand delivery, (**) email, and U.S. Mail this 9th day of February 2004, to the following:

(*) (**) Adam Teitzman, Staff Counsel
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

(**) Tracy Hatch
AT&T Communications of the
Southern States, LLC
101 North Monroe Street, Suite 700
Tallahassee, Florida 32301

(**) Nancy White
c/o Nancy Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301-1556

(**) Michael Gross
Florida Cable Telecommunications
246 East 6th Avenue
Tallahassee, Florida 32302

(**) Richard Chapkis
Verizon Florida, Inc.
201 North Franklin Street
MC: FLTC0717
Tampa, Florida 33602

(**) Matthew Feil
Florida Digital Network, Inc.
2301 Lucien Way, Suite 200
Maitland, Florida 32751

(**) Susan Masterton
Sprint Communications Company
1313 Blairstone Road
Post Office Box 2214
MC: FLTLHO0107
Tallahassee, Florida 32301

(**) Jeffrey J. Binder
Allegiance Telecom, Inc.
1919 M Street, NW
Washington, DC 20037

(**) Donna Canzano McNulty
MCI WorldCom
1203 Governors Square Boulevard
Suite 201
Tallahassee, Florida 32301

(**) Floyd R. Self
Messer, Caparelllo & Self
215 South Monroe Street, Suite 701
Tallahassee, FL 32301

(**) Norman H. Horton, Jr.
215 South Mornoe Street
Tallahassee, Florida 32302-1876

(**) Nanette Edwards
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, Alabama 35802

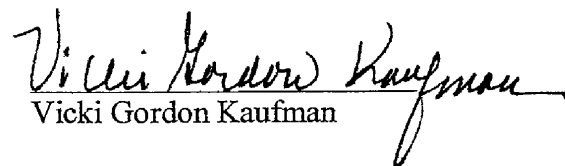
(**) Jake E. Jennings
Senior Vice-President
Regulatory Affairs & Carrier Relations
NewSouth Communications Corp.
NewSouth Center
Two N. Main Center
Greenville, SC 29601

(**) Jon C. Moyle, Jr.
Moyle, Flanigan, Katz, Raymond
& Sheehan, P.A.
The Perkins House
118 North Gadsden Street
Tallahassee, FL 32301

(**) Rand Currier
Geoff Cookman
Granite Telecommunications, LLC
234 Copeland Street
Quincy, MA

(**) Andrew O. Isar
Miller Isar, Inc.
2901 Skansie Avenue, Suite 240
Gig Harbor, WA 98335

(**) Scott A. Kassman
FDN Communications
390 North Orange Avenue
Suite 2000
Orlando, FL 32801


Vicki Gordon Kaufman