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ORIGINAL

February 11, 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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COMMISSION
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Re: Docket No. 030852-TP

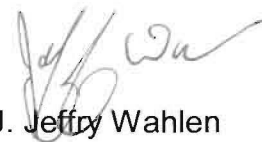
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Sprint's Preliminary Objections to BellSouth's Second Request for Admissions and Second Interrogatories (Nos. 8-32) and Third Request for Production of Documents (No. 4).

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

AUS _____
CAF _____ Enclosures
CMP _____
COM _____
CTR _____ cc: All Parties of Record
ECR _____
GCL _____
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FPSC-BUREAU OF RECORDS

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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: February 11, 2004

**SPRINT-FLORIDA, INC.'S AND
SPRINT COMMUNICATIONS COMPANY L.P.'S
PRELIMINARY OBJECTIONS TO BELLSOUTH'S
SECOND REQUEST FOR ADMISSIONS AND
SECOND INTERROGATORIES (NOS. 8-32)
AND THIRD REQUEST FOR PRODUCTION OF DOCUMENTS (No. 4)**

Sprint-Florida, Inc. and Sprint Communications Company, L.P., ("Sprint") pursuant Rule 28-106.206, Florida Administrative Code, and Rules 1.280, 1.340, 1.350, and 1.370, Florida Rules of Civil Procedure, hereby submits the following preliminary objections to BellSouth's Second Request for Admissions and Second Interrogatories (Nos. 8-32) and Third Request for Production of Documents (No. 4), served on February 4, 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

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

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. **Nos. 10, 11 and 12.** Sprint objects to Interrogatory Nos. 10, 11 and 12 on grounds that they seek information that is beyond the scope of discovery (i.e., relevant or calculated to lead to the discovery of admissible evidence) and because answering would impose an undue burden on Sprint. Interrogatory Nos. 10, 11 and 12 seek information about "all of the links in [Sprint's] network in Florida where [Sprint] use[s] [its] own facilities or lease[s] dark fiber from another carrier..." and are overbroad and burdensome because it seeks information about parts of Sprint's network other than the high capacity loops and transport at issue in this case. Sprint also objects to these three interrogatories on grounds that the term "link" is vague and ambiguous.

DATED this 11th day of February, 2004.



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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 (*) 11th day of February, 2004, to the following:

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