

Ruth Nettles

From: Keating, Beth [beth.keating@akerman.com]
Sent: Wednesday, May 21, 2008 2:34 PM
To: Filings@psc.state.fl.us
Subject: Docket NOs. 070691 and 080036
Attachments: 20080521142415618.pdf; 20080521142432225.pdf

Attached for electronic filing in the referenced consolidated Dockets, please find Bright House Network's Objections to Verizon's First Set of Interrogatories and First Requests for Production of Documents. Thank you for your assistance with this filing.

Sincerely,
Beth Keating

A.
Beth Keating
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106 East College Ave., Suite 1200
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B. Docket No. 070691-TP - Complaint and Request for Emergency Relief Against Verizon Florida, LLC for Anticompetitive Behavior in violation of Sections 364.10(4), 364.3381, and 364.10, F.S. and for failure to facilitate transfer of customers' numbers to Bright House Networks Information Services, LLC and its affiliate, Bright House Networks, LLC

Docket No. 080036-TP - Complaint and request for emergency relief against Verizon Florida, L.L.C for anticompetitive behavior in violation of 364.01(4), 364.3381, and 364.10, F.S., and for failure to facilitate transfer of customers' numbers to Comcast Phone of Florida, L.L.C. d/b/a Comcast Digital Phone.

C. On behalf of Bright House Networks Information Services, LLC and Bright House Networks, LLC

D. Number of Pages: BHN's Objections to Verizon's First Set of Interrogatories - 13 pages
BHN's Objections to Verizon's First Requests for Production of Documents - 5 pages

E: BHN's Objections to Verizon's First Set of Interrogatories
BHN's Objections to Verizon's First Requests for Production of Documents



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CIRCULAR 230 NOTICE: To comply with U.S. Treasury Department and IRS regulations, we are required to advise you that, unless expressly stated otherwise, any U.S. federal tax advice contained in this transmittal is not intended or written to be used, and cannot be used, by any person for the purpose of (i) avoiding penalties under the U.S. Internal Revenue Code, (ii) promoting, marketing or recommending to another party any transaction or matter addressed in this e-mail or attachment.

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May 21, 2008

Electronic Filing

Ms. Ann Cole
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: DOCKET NO. 070691-TP - Complaint and request for emergency relief against Verizon Florida LLC for anticompetitive behavior in violation of Sections 364.01(4), 364.3381, and 364.10, F.S., and for failure to facilitate transfer of customers' numbers to Bright House Networks Information Services (Florida) LLC, and its affiliate, Bright House Networks, LLC

DOCKET NO. 080036-TP - Complaint and request for emergency relief against Verizon Florida, L.L.C. for anticompetitive behavior in violation of Sections 364.01(4), 364.3381, and 364.10, F.S., and for failure to facilitate transfer of customers' numbers to Comcast Phone of Florida, L.L.C. d/b/a Comcast Digital Phone.

Dear Ms. Cole:

Attached for electronic filing in the above-referenced consolidated Dockets, please find Bright House Networks, LLC's Objections to Verizon's First Requests for Production of Documents to Bright House.

Thank you for your assistance with this filing. If you have any questions whatsoever,

{11.156790.1}

DOCUMENT NUMBER-DATE

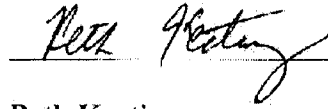
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Ms. Ann Cole
May 21, 2008
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please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Beth Keating", is written over a horizontal line.

Beth Keating
AKERMAN SENTERFITT
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Tallahassee, FL 32302-1877
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Fax: (850) 222-0103

Enclosures

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint and request for emergency relief against Verizon Florida LLC for anticompetitive behavior in violation of Sections 364.01(4), 364.3381, and 364.10, F.S., and for failure to facilitate transfer of customers' numbers to Bright House Networks Information Services (Florida) LLC, and its affiliate, Bright House Networks, LLC

Docket No. 070691-TP

In re: Complaint and request for emergency relief against Verizon Florida, L.L.C. for anticompetitive behavior in violation of Sections 364.01(4), 364.3381, and 364.10, F.S., and for failure to facilitate transfer of customers' numbers to Comcast Phone of Florida, L.L.C. d/b/a Comcast Digital Phone.

Docket No. 080036-TP
Filed: May 21, 2008

OBJECTIONS OF BRIGHT HOUSE NETWORKS INFORMATION SERVICES (FLORIDA), LLC, AND ITS AFFILIATE, BRIGHT HOUSE NETWORKS, LLC TO VERIZON'S FIRST DOCUMENT REQUESTS (NOS. 1-3)

Bright House Networks Information Services (Florida) LLC and Bright House Networks, LLC (collectively, "Bright House") hereby provide their objections to Verizon's first document request. The objections follow this cover sheet.

Respectfully submitted,

/s/ Christopher W. Savage

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Attorneys for:
Bright House Networks Information Services, LLC
Bright House Networks, LLC

May 21, 2008

General Objections

1. Bright House objects to all of the document requests (including all definitions and instructions) to the extent they seek information, or have the effect of seeking information, regarding the provision of video services and/or Internet services, on the grounds that such services are irrelevant to any of the issues in this case, and as such, these requests are unlikely to lead to the discovery of admissible evidence. *See, e.g.*, Definition A.

2. Bright House objects to all of the document requests (including all definitions and instructions) to the extent that they seek information, or have the effect of seeking information, that is confidential or proprietary in nature.

Specific Objections

1. Document Request No. 1 relates entirely to matters bearing on Bright House's video and/or broadband information services and therefore has no bearing on this case. Production of these documents is unlikely to lead to the discovery of admissible evidence. Bright House will not respond to this request.

2. Document Request No. 2 relates entirely to matters bearing on Bright House's video and/or broadband information services and therefore has no bearing on this case. Production of these documents is unlikely to lead to the discovery of admissible evidence. Bright House will not respond to this request.

3. The documents requested in Document Request No. 3 are extremely confidential, proprietary material. Bright House will provide such documents only upon execution of an appropriate confidentiality agreement that prevents public disclosure of the documents, limits the use of the documents to this proceeding only, and restricts the distribution of the documents within Verizon in a manner that ensures that no individuals with involvement in or responsibility for competing with Bright House will have any access to the documents.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via Electronic Mail, U.S. Mail First Class, or Hand Delivery this 21st day of May, 2008, to the persons listed below:

Dulancy L. O'Roark, III, VP/General Counsel Verizon Florida, LLC P.O. Box 110, MC FLTC 0007 Tampa, FL 33601 dc.oroark@verizon.com	David Christian Verizon Florida, Inc. 106 East College Ave. Tallahassee, FL 32301-7748 David.christian@verizon.com
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