

Ruth Nettles

From: Clark, Demetria Germaine [demetria.g.clark@verizon.com]
Sent: Monday, December 01, 2008 4:41 PM
To: Filings@psc.state.fl.us
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Subject: Docket 080234: Verizon FL LLC's Preliminary Objections to Staff's First Set of Interrogatories
Attachments: Dkt. 080234 - Verizon FL Objections to Staff's First Interrogatories 12.1.08.pdf

The attached filing is submitted on behalf of Verizon Florida LLC by

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The attached .pdf document consists of a total of 5 pages: Cover letter -1 page, Objections - 3 pages, and Certificate of Service -1 page.

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December 1, 2008 - **VIA ELECTRONIC MAIL**

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

Re: Docket No. 080234-TP

Implementation of Florida Lifeline program involving bundled service packages and placement of additional enrollment requirements on customers

Dear Ms. Cole:

Enclosed for filing in the above matter are Verizon Florida LLC's preliminary objections to Staff's First Set of Interrogatories to Verizon dated November 19, 2008. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at 678-259-1449.

Sincerely,

s/ Dulaney L. O'Roark III

Dulaney L. O'Roark III

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of Florida lifeline program) Docket No. 080234-TP
involving bundled service packages and) Filed: December 1, 2008
placement of additional enrollment requirements)
on customers)
_____)

VERIZON FLORIDA LLC'S PRELIMINARY OBJECTIONS TO COMMISSION STAFF'S FIRST SET OF INTERROGATORIES

Pursuant to the Order Establishing Procedure in this docket dated September 15, 2008, Verizon Florida LLC ("Verizon") submits the following general objections to Commission Staff's First Set of Interrogatories to Verizon dated November 19, 2008 (the "Discovery Requests").

GENERAL OBJECTIONS

1. Verizon objects to the Discovery Requests and all Definitions associated with the Discovery Requests to the extent they purport to impose obligations that are different from, or go beyond, the obligations imposed under Rules 1.280, 1.340, and 1.351 of the Florida Rules of Civil Procedures and the Rules of the Commission.

2. Verizon objects to the Discovery Requests to the extent they seek documents or information protected by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privileges or doctrines. Any inadvertent disclosure of such privileged documents or information shall not be deemed to be a waiver of the attorney-client privilege, attorney work-product doctrine, or other applicable privileges or doctrines.

3. Verizon objects to the Discovery Requests to the extent that they are vague and ambiguous, particularly to the extent that it uses terms that are undefined or vaguely defined.

4. Verizon objects to the Discovery Requests to the extent they seek confidential business, financial, or other proprietary documents or information. Verizon fur-

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ther objects to the Discovery Requests to the extent they seek documents or information protected by the privacy protections of the Florida or United States Constitutions, or any other law, statute, or doctrine.

5. Verizon objects to the Discovery Requests to the extent they seek documents or information equally available to Staff as to Verizon through public sources or records or which is already in the possession, custody or control of the Commission.

6. To the extent Verizon responds to Staff's Discovery Requests, Verizon reserves the right to amend, replace, supersede, or supplement its responses as may become appropriate in the future, but it undertakes no continuing or ongoing obligation to update its responses.

7. Verizon objects to the Discovery Requests to the extent that they seek to impose an obligation on Verizon to respond on behalf of subsidiaries, affiliates, or other persons that are not subject to the jurisdiction of the Commission.

8. Verizon objects to the Discovery Requests to the extent they seek information that is not reasonably calculated to lead to the discovery of admissible evidence and not relevant to the subject matter of this proceeding.

9. Verizon objects to the Discovery Requests to the extent they are duplicative and overlapping, cumulative of one another, overly broad, or seek responses in a manner that is unduly burdensome.

Respectfully submitted on December 1, 2008.

By: s/ Dulaney L. O'Roark III
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Attorney for Verizon Florida LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing were sent via electronic mail and U.S.

Mail on December 1, 2008.

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s/ Dulaney L. O'Roark III
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