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VIA AIRBORNE EXPRESS**

August 2, 1991

Mr. Steven Tribble, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0850

RE: ~~Docket No. 910060-TP~~

Dear Mr. Tribble:

Enclosed for filing with the Commission are an original and fifteen (15) copies of Sprint Gateways' Responses, Objections and Motion for Protective Order in Response to Citizens' First Set of Requests for Production of Documents. Three copies of the lengthy attachments to Questions 3 and 5 are also enclosed. Please return a date-stamped copy of this letter to me. Thank you.

Sincerely,

Craig D. Dingwall

Craig D. Dingwall
General Attorney

- ACK
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- LIN _____
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- GTH _____

Enclosures

cc: Tony Key
Parties of Record

RECEIVED & FILED

TB

FPS&B BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

07866 AUG -5 1991

FPS&B-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION


In re: Petition of the Attorney
General and the Public Counsel
to Adopt Rules Governing 900
Services.

) Docket No. 910060-TP
) Filed: August 5, 1991
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**SPRINT GATEWAYS' RESPONSES, OBJECTIONS, AND MOTION FOR
PROTECTIVE ORDER IN RESPONSE TO CITIZENS' FIRST SET
OF REQUESTS FOR PRODUCTION OF DOCUMENTS**

Sprint Gateways ("Gateways"), by and through its attorneys, pursuant to Florida Administrative Code Rule 25-22.034 and Rule 1.340 of the Florida Rules of Civil Procedure, submits the following responses and objections to Florida's Citizens' ("Citizens'") First Set of Requests for Production of Documents. The responses were prepared by Mr. Michael Nelson, Staff Director-Regulatory Affairs, with assistance from the undersigned counsel. To the extent that any response and objection might otherwise be the subject of a motion for a protective order under Rule 1.280(c) of the Florida Rules of Civil Procedure, Gateways respectfully requests that this response be considered such a motion.

Respectfully submitted,


Craig D. Dingwall
Sprint Gateways
2002 Edmund Halley Drive
Reston, VA 22066
703/264-4968

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of the Attorney)
General and the Public Counsel)
to Adopt Rules Governing 900)
Services.)

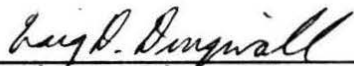
Docket No. 910060-TP
Filed: August 5, 1991

NOTICE OF SERVICE

Sprint Gateways ("Gateways"), by and through its attorneys, serves this notice that Gateways has, on August 2, 1991, served its responses, via overnight mail, to the first set of requests for production of documents of the Citizens of Florida.

DATED: August 2, 1991

Respectfully submitted,



Craig D. Dingwall
Sprint Gateways
2002 Edmund Halley Drive
Reston, VA 22066
703/264-4968