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RECORDS AND REPORTING

July 21, 1998

BY HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 980696-TP

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Objections of Sprint-Florida, Inc. to FCTA's First Set of Interrogatories and Second Request for Production of Documents.

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.

Yours truly,

John P. Fons
John P. Fons

ACK _____ Enclosures
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General Objections

1. Sprint objects to each of FCTA's 1st Interrogatories and FCTA's 2nd PODs which directly or indirectly reference "BCPM Version 3.1 for the State of Florida," on the grounds that such discovery relates to a cost proxy model which Sprint has not yet proposed in any filing with this Commission. Until Sprint has in fact filed a cost proxy model with this Commission in this proceeding, FCTA's 1st Interrogatories and FCTA's 2nd PODs are premature. No such discovery should take place until after Sprint has filed its cost proxy model. To do otherwise would place an unreasonable burden on Sprint to redirect limited resources from completing the filing required on August 3, 1998, to completing discovery which must be responded to by August 5, 1998. FCTA has proffered no basis for why it must have this data even before it has seen Sprint's filing.

2. Sprint is, however, willing to respond to FCTA's 1st Interrogatories and 2nd PODs, if otherwise not objectionable, 10 days following Sprint's August 3, 1998, direct testimony filing in this proceeding. At that time, the full nature of Sprint's filing will be known. Sprint's Responses, to be filed on August 13, 1998, will provide FCTA with sufficient time to prepare its rebuttal testimony scheduled to be filed on September 2, 1998.

Specific Objections

3. Sprint has the following specific objections to certain of FCTA's 1st Interrogatories and FCTA's 2nd PODs. Additionally, Sprint retains the right to file additional objections once it

files its direct testimony and exhibits relating to its proposed cost-proxy model.

Interrogatories

4. As stated in its General Objection, Sprint objects to FCTA's 1st Interrogatory No. 2 on the grounds that the request is premature.

5. Sprint objects to FCTA's 1st Interrogatory No. 2 on the grounds that historical access line data is not relevant to a forward-looking cost study as required by Paragraph 4(b), Section 1 of Chapter 93-277, Laws of Florida.

6. Sprint objects to FCTA's 1st Interrogatory No. 4 on the grounds that historical rental fees are not relevant to a forward-looking cost study as required by Paragraph 4(b), Section 1 of Chapter 93-277, Laws of Florida.

7. Sprint objects to FCTA's 1st Interrogatory No. 5 on the grounds that "the methodology used to develop the rental fees charged by Sprint to third parties and affiliates for use of its infrastructure . . ." is not relevant to a forward-looking cost study as required by Paragraph 4(b), Section 1 of Chapter 93-277, Laws of Florida.

Production of Documents

8. Sprint objects to FCTA's 2nd POD, No. 3 on the same grounds as stated in Sprint's objections to FCTA's 1st Interrogatories Nos. 1-5.

9. Sprint objects to FCTA's 2nd POD, No. 4 on the grounds that Sprint's annual surveillance reports for the years 1995, 1996

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 21st day of July, 1998, to the following:

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