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September 11, 2000

**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. 990649-TP

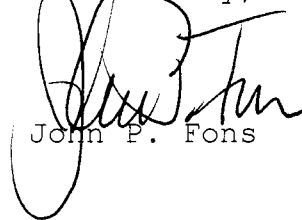
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Sprint's General Objections to BellSouth's First Set of Interrogatories (1-20) and First Request for Production of Documents (1-14).

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

APP  
CAF  
CMP  
COM  
COR  
FOR  
LEG  
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RGO  
SEC  
SER  
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Enclosures

cc: All parties of record

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

11239 SEP 11 8

FPSC-RECORDS/REPORTING

ORIGINAL

In re: Investigation into  
pricing of unbundled network  
elements

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DOCKET NO. 990649-TP  
FILED: September 11, 2000

**SPRINT'S GENERAL OBJECTIONS TO BELL SOUTH'S  
FIRST SET OF INTERROGATORIES (1-20) AND FIRST  
REQUEST FOR PRODUCTION OF DOCUMENTS (1-14)**

Sprint Communications Company, Limited Partnership ("Sprint"), pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.340, 1.350 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following General Objections to BellSouth Telecommunications, Inc.'s ("BellSouth") First Set of Interrogatories and First Request for Production of Documents served on September 1, 2000.

The objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the 10-day requirement established by the Procedural Order No. PSC-00-0540-PCO-TP. Should additional grounds for objection be discovered as Sprint prepares its responses to the above-referenced requests, Sprint reserves the right to supplement, revise, or modify its objections at the time that it serves its responses on BellSouth. Moreover, should Sprint determine that a Protective Order is necessary with respect to any of the material requested by BellSouth, Sprint reserves the right to

DOCUMENT NUMBER-DATE

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file a motion with the Commission seeking such an order at the time that it serves its responses on BellSouth.

#### GENERAL OBJECTIONS

Sprint makes the following general objections to BellSouth's First Set of Interrogatories and First Request for Production of Documents (jointly referred to as the "requests"), which will be incorporated by reference into Sprint's responses when they are served on BellSouth.

1. Sprint objects to the requests to the extent that such requests seek to impose an obligation on Sprint to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such requests are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. Sprint has interpreted BellSouth's requests to apply to Sprint's operations in Florida and will limit its responses accordingly. To the extent that any request is intended to apply to matters other than Florida operations, Sprint objects to such request to produce as irrelevant, overly broad, unduly burdensome and oppressive.

3. Sprint objects to each and every request and instruction to the extent that such request or instruction calls for information which is exempt from discovery by virtue of the

attorney-client privilege, work product privilege, or other applicable privilege.

4. Sprint objects to each and every request insofar as the request is 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 requests. Any responses provided by Sprint in response to BellSouth's requests will be provided subject to, and without waiver of, the foregoing objection.

5. Sprint objects to each and every request insofar as the request is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. Sprint will attempt to note in its responses each instance where this objection applies.

6. Sprint objects to BellSouth's discovery requests, instructions and definitions, insofar as they seek to impose obligations on Sprint that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

7. Sprint objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission, or elsewhere.

8. Sprint objects to each and every request insofar as it is unduly burdensome, expensive, oppressive, or excessively time-consuming as written.

9. Sprint objects to each and every request to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that BellSouth requests proprietary confidential business information which is not subject to the "trade secrets" privilege, Sprint will make such information available to counsel for BellSouth pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

10. Sprint is a large corporation with employees located in many different locations throughout the United States. In the course of its business, Sprint creates countless documents that are not subject to Florida Public Service Commission or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document will be provided in response to these discovery requests. Rather, Sprint's responses will provide, subject to any applicable objections, all of the information obtained by Sprint after a reasonable and diligent search conducted in connection with these requests. Sprint shall conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the discovery requests purport

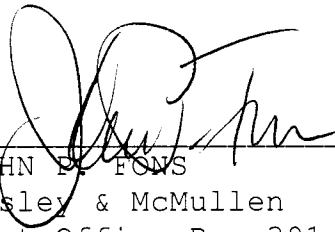
to require more, Sprint objects on the grounds that compliance would impose an undue burden or expense.

DATED this 11<sup>th</sup> day of September, 2000.

Respectfully submitted,

CHARLES J. REHWINKEL  
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and



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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by e-mail transmission, U. S. Mail, or hand delivery (\*) this 11<sup>th</sup> day of September, 2000, to the following:

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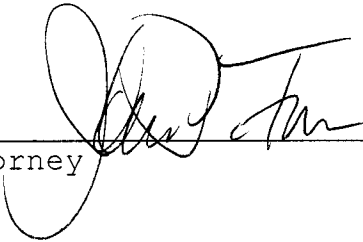
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