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November 15, 1996

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FPSC-RECORDS/REPORTING

Honorable Blanca S. Bayo  
Director - Records and Reporting  
Florida Public Service Commission  
Room 110  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

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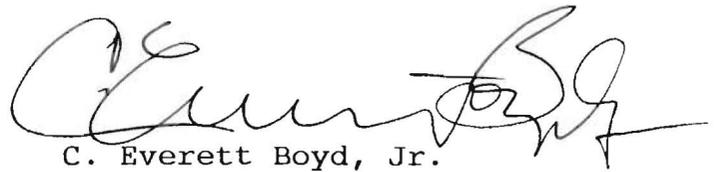
FPSC-BUREAU OF RECORDS

RE: Docket No. <sup>960786</sup>~~961173~~-TP

Dear Ms. Bayo:

Enclosed for filing are an original and 15 copies of Sprint Communications Company Limited Partnership's Objections to BellSouth Telecommunications First Set of Interrogatories, and Sprint Communications Company Limited Partnership's Objections to BellSouth Telecommunications's First Request for Production fo Documents with regard to the referenced docket.

Sincerely,



C. Everett Boyd, Jr.

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU Stavara CEBJr/bc
- CTR \_\_\_\_\_ Enclosures
- EAG \_\_\_\_\_
- LEG 2 cc: Attorneys of Record
- LIN 3 \_\_\_\_\_
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1 \_\_\_\_\_
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

DOCUMENT NUMBER-DATE

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth's Docket No. 960786-TL  
Entry into InterLATA Services  
Pursuant to Section 271 of the Federal Filed: November 15, 1996  
Telecommunications Act of 1996

**SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP'S  
OBJECTIONS TO BELL SOUTH TELECOMMUNICATION'S  
FIRST SET OF INTERROGATORIES**

Sprint Communications Company Limited Partnership ("Sprint"), by and through its undersigned counsel, and pursuant to Rules 25-22.034 and 25-22.035, Florida Administrative Code, and Rules 1.340 and 1.280(b), Fla. R. Civ. P., hereby submits its objections to the First Set of Interrogatories to Sprint filed by BellSouth Telecommunications, Inc. ("BellSouth").

The objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the 10-day requirement set forth in Order No. PSC-96-0945-PCO-TP issued by the Florida Public Service Commission ("the Commission") in the above-referenced docket on July 19, 1996. Should additional grounds for objection be discovered as Sprint prepares its answers to the above-referenced set of interrogatories, Sprint reserves the right to supplement, revise, or modify its objections at the time that it serves its answers 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 file a motion with the Commission seeking such an order at the time that it serves its answers on BellSouth.

**General Objections**

Sprint makes the following general objections to BellSouth's first set of interrogatories which will be incorporated by

DOCUMENT NUMBER-DATE

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reference into Sprint's specific response when its answers are served on BellSouth.

1. Sprint objects to the interrogatories to the extent that such interrogatories seek to impose an obligation on Sprint to respond on behalf of subsidiaries, affiliates or other persons or entities 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 interrogatories to apply to Sprint's regulated intrastate operations in Florida and will limit its answers accordingly. To the extent that any interrogatory is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission, Sprint objects to such interrogatory as irrelevant, overly broad, unduly burdensome, and oppressive.

3. Sprint objects to each and every interrogatory and instruction to the extent that such interrogatory 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 interrogatory 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 interrogatories. Any answers provided by Sprint in response to BellSouth's interrogatories will be provided subject to, and without waiver of, the foregoing objection.

5. Sprint objects to each and every interrogatory 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 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 which exceed the requirements of the Florida Rules of Civil Procedure or Florida law, particularly Instruction (X).

7. Sprint objects to providing information to the extent that such information is already in the public record before the Commission.

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

9. Sprint objects to each and every interrogatory 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's interrogatories request 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.

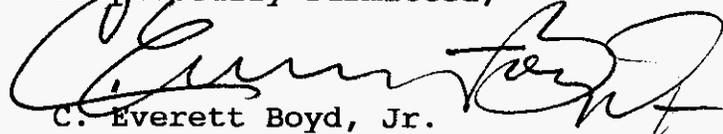
Objections to Specific Interrogatories

Subject to, and without waiver of, the foregoing general objections, Sprint enters the following specific objections with respect to BellSouth's interrogatories:

Interrogatory Nos. 1, 2, 4, 5, 6, 7 and 8: Pursuant to the general objections stated above, Sprint objects to these interrogatories on the grounds that they seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence related to the issue of whether BellSouth has met or will be able to meet the requirements of Section 271 of the Telecommunications Act of 1996. As to interrogatory numbers 1, 5 and 8, Sprint further objects on the basis that the discovery seeks "trade secrets" and proprietary confidential business information; Sprint incorporates paragraph 9 of its general objections.

DATED this 15<sup>TH</sup> day of November, 1996.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U.S. mail on this 15<sup>th</sup> day of November 1996, to the following:

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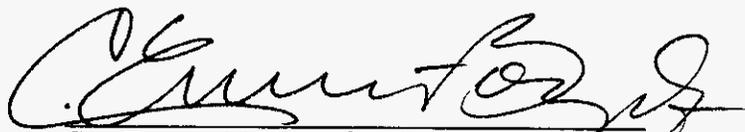
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