

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Joint Petition of Robert A. Butterworth, Attorney General, and the Citizens of the State of Florida, by and through the Office of Public Counsel, for Initiation of Formal Proceedings, Pursuant to Section 120.57, F.S., to Investigate the Practice of Slamming and to Determine the Appropriate Remedial Measures

Docket No. 99000-TI

Filed: Sept. 24, 1997

SPRINT'S OBJECTIONS TO THE CITIZENS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

Sprint Communications Company Limited Partnership ("Sprint"), by and through its undersigned attorneys, pursuant to Order No. PSC-97-1071-PCO-TI and applicable Florida Rules of Civil Procedure, files its objections to the First Request for Production of Documents served by the Citizens of Florida ("Citizens"), and states:

General Objections

1. Sprint objects to the instructions and definitions contained in the request in that Citizens attempt to impose upon Sprint obligations greater than that imposed by the Florida Rules of Civil Procedure and Commission Rules relating to discovery.

2. Sprint objects to the request to the extent that it seeks production of documents protected by the attorney-client privilege, the work product doctrine or the self-critical analysis privilege.

3. The objections asserted herein are preliminary in nature due to the procedural requirements of this docket. Should additional grounds for objections be discovered in preparing

Sprint's response to the request, Sprint reserves the right to assert such additional grounds when it serves its response.

ACK _____
AFA _____
APP 1
CAF _____
CMU 2
CTR _____
EAG _____
LEG _____
LIR 5
R. _____
SEL 1
WAS _____
OTH _____

RECEIVED & FILED

[Signature]
FPSC-RECORDS/REPORTING

DOCUMENT NUMBER-DATE

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4. Sprint objects to the definitions of "you" and "your" contained in the request to the extent such definitions seek to impose a duty on Sprint to respond on behalf of subsidiaries, affiliates or other entities or persons not parties to this docket.

Response

5. Sprint objects to item numbers 1 through 13 on the basis that the requests are vague, ambiguous, overbroad, voluminous and unduly burdensome. The requests are not limited to operations in Florida, and, thus, seek information for all states in which Sprint operates as an IIC. Subject to the foregoing, Sprint will attempt to produce Florida-specific documents that are responsive to the request.

6. Sprint objects to item numbers 1 through 13 on the basis that the documents sought include "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. In addition, to the extent the requests seek documents containing proprietary confidential business information which is not subject to the trade secrets privilege, Sprint will produce such documents upon entry of an appropriate protective agreement or order.

DATE: this 27th day of September 1997.

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 24th day of September 1997, to the following:

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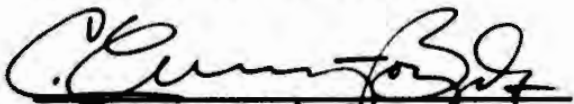
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