

ORIGINAL

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RECORDS AND REPORTING

August 10, 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 AT&T's Second 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

RECEIVED & FILED

FPSC BUREAU OF RECORDS

- ACK
- AFA 2 jpf/csu
- APP _____
- CAF _____ Enclosures
- CMU 1 cc: All parties of record
- CTR 1 a:\data\jpf\utd\980696.byo.doc
- EAG _____
- LEG 2
- LIN 5
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

DOCUMENT NUMBER-DATE

08469 AUG 10 98

FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the Cost of
Local Telecommunications Service,
pursuant to Section 364.025, Florida
Statutes

) DOCKET NO. 980696-TP
) FILED: August 10, 1998
)
)
)

**OBJECTIONS OF SPRINT-FLORIDA, INC. TO
AT&T'S SECOND SET OF INTERROGATORIES AND
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS**

Sprint-Florida, Inc. ("Sprint"), by and through its undersigned attorneys, submits its Objections to AT&T Communications of the Southern States, Inc.'s ("AT&T") Second Set of Interrogatories (37-45) ("AT&T's 2nd Interrogatories") and Second Request for Production of Documents (17-27) ("AT&T's 2nd PODs"), served on August 5, 1998, by hand delivery, stating as follows:

Introductory Statement


The Order Establishing Procedure, issued June 19, 1998, requires that all objections to discovery be made within five days of service of the discovery request. This is an unprecedented and unduly burdensome requirement. It provides inadequate time to carefully analyze and digest the nature and scope of the discovery requests, especially when the discovery is hand-delivered to Sprint. Consequently, in order to avoid inadvertent waiver of its objection rights, Sprint must initially object to all discovery requests. It is not Sprint's intention by doing so to unduly elay responses to legitimate discovery requests. Should additional

DOCUMENT NUMBER-DATE

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Respectfully submitted this 10th day of August, 1998.



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ATTORNEYS FOR SPRINT-FLORIDA, INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 10th day of August, 1998, to the following:

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