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RECORDS AND REPORTING

August 11, 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 Sprint-Florida, Inc.'s Motion to Compel AT&T to Respond to Sprint-Florida's First Set of Interrogatories and First Request for Production of Documents.

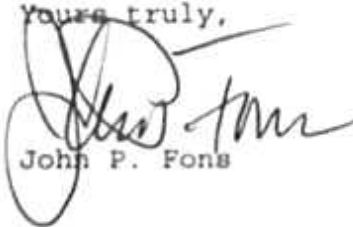
Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

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Yours truly,



John P. Fons

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

DOCUMENT NUMBER-DATE

08531 AUG 11 88

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the Cost of )  
Local Telecommunications Service, ) DOCKET NO. 980696-TP  
pursuant to Section 364.025, Florida ) FILED: August 11, 1998  
Statutes )  
\_\_\_\_\_ )

**SPRINT-FLORIDA, INC.'S MOTION TO COMPEL  
AT&T TO RESPOND TO SPRINT-FLORIDA'S  
FIRST SET OF INTERROGATORIES AND  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Sprint-Florida, Inc. ("Sprint"), pursuant to Rule 28-106.204(a), Florida Uniform Rules of Administrative Procedure, requests the Commission to Compel AT&T Communications of the Southern States, Inc. ("AT&T") to respond to Sprint's First Set of Interrogatories (Nos. 1 and 2) and Sprint's First Request for Production of Documents (No. 1), stating as follows:

1. On August 4, 1998, Sprint served on AT&T by hand delivery its First Set of Interrogatories (Nos. 1 and 2) ("Sprint's Interrogatories") and its First Request for Production of Documents (No. 1) ("Sprint's PODs").

2. On August 10, 1998, AT&T filed its Objections to Sprint's Interrogatories and Sprint's PODs to AT&T.

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

valid objection to Sprint's Interrogatory No. 1, AT&T should be ordered to furnish the requested information.

6. AT&T's objection to Sprint's Interrogatory No. 2 states that it is the "same objection as Interrogatory No. 1." Again, AT&T's objection to Interrogatory No. 1 is misguided and without merit. Moreover, Sprint's Interrogatory No. 2 requests information which AT&T contends it uses in the HAI Model being proposed by AT&T in this proceeding. The information requested by Sprint is, therefore, relevant and necessary. Sprint has previously provided AT&T and PNR a software program which will produce the information quickly and easily from the PNR data base. There is no basis for any contention by AT&T that the requested information is unduly burdensome. AT&T's objection is without merit, and AT&T should be ordered to provide the requested information.

7. AT&T has objected to Sprint's POD No. 1 on the same misguided and erroneous grounds as AT&T's objection to Sprint's Interrogatory No. 1. The basis for Sprint's requested order to compel AT&T to respond is contained in paragraphs 3 through 5, above. As stated therein, AT&T's objection is without merit, and AT&T should be ordered to provide the requested data.

DATED this 11<sup>th</sup> day of August, 1998.

Respectfully submitted,



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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 11<sup>th</sup> day of August, 1998, to the following:

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