

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: September 21, 1998

**OBJECTIONS OF SPRINT-FLORIDA, INC. TO
 AT&T'S FOURTH SET OF INTERROGATORIES AND
FOURTH 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") Fourth Set of Interrogatories (47-54) ("AT&T's 4th Interrogatories") and Fourth Request for Production of Documents (29-32) ("AT&T's 4th PODs"), served on September 15, 1998, by hand delivery, stating as follows:

General Objection

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 grounds for objections arise as Sprint prepares its responses to


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this discovery, Sprint reserves the right to revise or supplement its objections.

Respectfully submitted this 21st day of September, 1998.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 21st day of September, 1998, to the following:

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