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August 28, 2000

ORIGINAL

RECORDS AND REPORTING

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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. 000761-TP

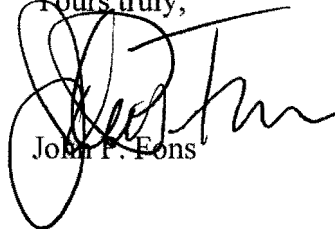
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Sprint PCS' General Objections to BellSouth's First Set of Interrogatories (1 to 79) and First Request for Production of Documents (1 to 21).

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

Enclosures

cc: All parties of record

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In Re: Petition by Sprint PCS for Arbitration)
of Certain Terms and Conditions of a Proposed)
Agreement with BellSouth Pursuant to)
Section 252 of the Communications Act)
_____)

Docket No. 000761-TP
Filed: August 28, 2000

**SPRINT PCS' GENERAL OBJECTIONS TO BELLSOUTH'S
FIRST SET OF INTERROGATORIES (1 to 79) AND FIRST
REQUEST FOR PRODUCTION OF DOCUMENTS (1 to 21)**

Sprint Spectrum L.P., d/b/a Sprint PCS ("Sprint PCS"), pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.340, 1.350 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following General Objections to BellSouth Telecommunications, Inc.'s ("BellSouth") First Set of Interrogatories and First Request for Production of Documents served on August 18, 2000.

The objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the 10-day requirement anticipated to be established by the yet-to-be issued Procedural Order. Should additional grounds for objection be discovered as Sprint PCS prepares its responses to the above-referenced requests, Sprint PCS reserves the right to supplement, revise, or modify its objections at the time that it serves its responses on BellSouth. Moreover, should Sprint PCS determine that a Protective Order is necessary with respect to any of the material requested by BellSouth, Sprint PCS reserves the right to file a motion with the Commission seeking such an order at the time that it serves its responses on BellSouth.

GENERAL OBJECTIONS

Sprint PCS makes the following general objections to BellSouth's First Set of Interrogatories and First Request for Production of Documents (jointly referred to as the "requests"), which will be incorporated by reference into Sprint PCS' responses when they are served on BellSouth.

1. Sprint PCS objects to the requests to the extent that such requests seek to impose an obligation on Sprint PCS to respond on behalf of subsidiaries, affiliates, or other persons 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 PCS has interpreted BellSouth's requests to apply to Sprint PCS' operations in Florida and will limit its responses accordingly. To the extent that any request is intended to apply to matters other than Florida operations, Sprint PCS objects to such request to produce as irrelevant, overly broad, unduly burdensome and oppressive.

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

5. Sprint PCS objects to each and every request 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 PCS will attempt to note in its responses each instance where this objection applies.

6. Sprint PCS objects to BellSouth's discovery requests, instructions and definitions, insofar as they seek to impose obligations on Sprint PCS that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

7. Sprint PCS objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission, or elsewhere.

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

9. Sprint PCS objects to each and every request 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 requests proprietary confidential business information which is not subject to the "trade secrets" privilege, Sprint PCS 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.

10. Sprint PCS is a large corporation with employees located in many different locations throughout the United States. In the course of its business, Sprint PCS creates countless documents that are not subject to Florida Public Service Commission or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document will be provided in response to these discovery requests. Rather, Sprint PCS' responses will provide, subject to any applicable objections, all of the information obtained by Sprint PCS after a reasonable and diligent search conducted in

connection with these requests. Sprint PCS shall conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the discovery requests purport to require more, Sprint PCS objects on the grounds that compliance would impose an undue burden or expense.

Respectfully submitted this 28th day of August, 2000.

A handwritten signature in black ink, appearing to read "John P. Fons", is written over a horizontal line. The signature is stylized and somewhat cursive.

JOHN P. FONS
Ausley & McMullen
P. O. Box 391
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(850) 224-9115

and

Charles W. McKee, Esq.
Senior Attorney
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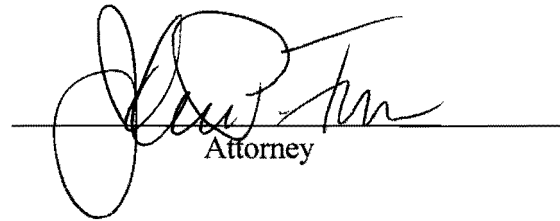
ATTORNEYS FOR SPRINT PCS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by hand delivery (*) this 28th day of August, 2000, to the following:

Lisa S. Foshee, Esq. *
Nancy White, Esq.
Michael Goggin, Esq.
c/o Nancy Sims
BellSouth Telecommunications, Inc.
150 S. Monroe St., Suite 400
Tallahassee, FL 32301

Diana Caldwell, Esq. *
Felicia Banks, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850


Attorney

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