Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

VERIZON FLORIDA LLC,	*	
	*	
Complainant,	*	
	*	**Docket No. 15-73**
v.	*	**File No. EB-15-MD-002**
	*	
FLORIDA POWER AND LIGHT COMPANY,	*	**Related to**
	*	**Docket No. 14-216**
	*	**File No. EB-14-MD-003**
Respondent.	*	
	*	

FLORIDA POWER AND LIGHT COMPANY'S OBJECTIONS
TO VERIZON FLORIDA LLC'S REQUESTS FOR PRODUCTION OF DOCUMENTS

Florida Power and Light Company ("FPL") respectfully submits the following objections to Verizon Florida's ("Verizon") Requests for Production of Documents ("Requests"):

GENERAL OBJECTIONS

1. FPL hereby reserves any objections it may have to the admission in evidence of the information provided herein on the grounds of materiality, relevancy or other proper grounds for objection.

2. The information provided herein is not based solely on the knowledge of FPL, but includes knowledge of FPL's agents, representatives and attorneys, unless privileged.

3. The word usage and sentence structure of the responses may be that of the attorney assisting FPL and thus does not necessarily purport to be the precise language of FPL.

4. FPL hereby reserves all objections to the extent the requests exceed those permissible under the rules or seek inquiry not permissible under the rules.

5. FPL objects to Verizon's definition and use of the word "concerning" as covering virtually any document that so much as mentions an item identified by the requests.

SPECIFIC OBJECTIONS TO
REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Joint use agreements, pole license agreements, pole attachment agreements, and pole rental agreements entered by FPL with entities other than governmental entities, including all amendments to those agreements, that are currently operative or were entered into since 2000.

OBJECTION:

FPL objects to this request on the grounds that it is overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. These grounds include, but are not limited to, that the request seeks other joint use agreements although such agreements have no bearing on the agreement or relationship between FPL and Verizon. Subject to and without waiving the forgoing objections, FPL will provide responsive pole attachment agreements.

4. All documents concerning FPL's cost for installing a utility pole, including all documents concerning the statement on page 10 of FPL's Response that "[t]he fully allocated cost of installing a single pole, ranges from $500 to 1,000" and all documents concerning the estimated figures for "the bare cost of installing a pole today" that appear at paragraph 18 of Mr. Kennedy's Declaration.

OBJECTION:

FPL objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing, and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." Subject to and without waiving the foregoing objections, FPL will provide a response reflecting a reasonable set of documents.

5. All documents concerning the statement at paragraph 9 of Mr. Spain's Declaration that "the average cost in 2015 dollars of an installed distribution pole (as accounted for in

account 364 and net of a 15% appurtenances factor) is $586.41" and all documents concerning the statement at page 26 of the Response and paragraph 32 of Mr. Kennedy's Declaration that "FPL's actual 2014 costs and the FCC's pole attachment formula" result in a net investment per distribution pole of $586, a 4.61% O&M factor, and a 1.27% A&G factor.

OBJECTION:

FPL objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing, and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." Subject to and without waiving the foregoing objections, FPL will provide a response reflecting a reasonable set of documents.

6. All documents concerning FPL's cost for relocating a utility pole, including all documents concerning the statement at page 23 of the Response and paragraph 22 of Mr. Kennedy's Declaration that the "relocation of just one pole costs between $500 and $1,000."

OBJECTION:

FPL objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing, and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." This request is also not reasonably limited in time and thus would cover thousands of relocations. Subject to and without waiving the foregoing objections, FPL will provide a response reflecting a reasonable set of documents.

7. All documents concerning the statement at paragraph 19 of Mr. Kennedy's Declaration that "FPL relocates between 50 and 500 FPL poles per year," including all documents concerning the reason for the relocation and FPL's coordination with Verizon regarding pole relocations and replacements.

OBJECTION:

FPL objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing, and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." This request is also not

reasonably limited in time and thus would cover thousands of relocations. Subject to and without waiving the foregoing objections, FPL will provide a response reflecting a reasonable set of documents.

8. All documents concerning FPL's invoicing and collection of "initial," application," "permit," "permitting," and "inspection" fees from CLECs and cable companies as referenced on page 14 of FPL's Response and paragraphs 9 and 14 of Mr. Kennedy's Declaration, including all documents concerning FPL's invoicing and collection of the $13 "inspection fee" and the $20.95 and $135.95 "permit," "permitting," and "application" fees referenced at paragraphs 9 and 14 of Mr. Kennedy's Declaration.

OBJECTION:

FPL objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing, and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." This request is also not reasonably limited in time and thus would cover thousands of transactions. Subject to and without waiving the foregoing objections, FPL will provide a response reflecting a reasonable set of documents.

9. All documents concerning FPL's invoicing and collection of "rates of $45 to $65 per hour and . . . fees ranging from $7.95 to $13 per pole" from CLECs and cable companies for "work with FPL's designated pole attachment contractor" as referenced on page 15 of FPL's Response and at paragraph 20 of Mr. Kennedy's Declaration.

OBJECTION:

FPL objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing, and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." Subject to and without waiving the foregoing objections, FPL will provide a response reflecting a reasonable set of documents.

10. All documents concerning FPL's invoicing and collection of make-ready and engineering costs from CLECs and cable companies, including all documents concerning the statement at paragraph 11 of Mr. Kennedy's Declaration that "FPL estimates current engineering overheads costs to range from $100-$150 per pole installed."

OBJECTION:

FPL objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing, and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." This request is also not reasonably limited in time and thus would cover thousands of transactions. Subject to and without waiving the foregoing objections, FPL will provide a response reflecting a reasonable set of documents.

11. All documents concerning FPL's invoicing and collection of pole replacement costs from CLECs and cable companies, including all documents concerning the statement at paragraph 13 of Mr. Kennedy's Declaration that the "typical FPL make-ready charge to a third party applicant for the replacement of an FPL distribution pole with a taller stronger distribution pole is approximately $4,390 in today's dollars."

OBJECTION:

FPL objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing, and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." This request is also not reasonably limited in time and thus would cover thousands of transactions. Subject to and without waiving the foregoing objections, FPL will provide a response reflecting a reasonable set of documents.

12. All documents concerning the statement at paragraph 12 of Mr. Kennedy's Declaration that the "incremental cost to install a pole 100 inches taller than required by FPL is $294.71 on a feeder pole and $125.87 on a lateral pole, not including overhead or administrative and general ("A&G") costs," including all documents concerning the figures in footnotes 1 and 2.

OBJECTION:

FPL objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing, and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." Subject to and without waiving the foregoing objections, FPL will provide a response reflecting a reasonable set of documents.

13. All documents concerning the statement at paragraph 12 of Mr. Kennedy's Declaration that "FPL and Verizon may have negotiated a 50% pole ownership cost split, which today would run Verizon approximately $300 to $500 (excluding A&G) per pole."

OBJECTION:

FPL objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing, and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." Subject to and without waiving the foregoing objections, FPL will provide a response reflecting a reasonable set of documents.

14. All documents concerning the statement on page 17 of FPL's Response that "Verizon's attachments require more space than their competitors due to sag."

OBJECTION:

FPL objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, FPL will provide a response reflecting a reasonable set of documents.

15. All documents concerning FPL's decision "in certain circumstances" to "decline to expand capacity to accommodate attachers" as referenced on page 18 of FPL's Response.

OBJECTION:

FPL objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing, and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." This request is also not reasonably limited with respect to time or attaching entities. Subject to and without

waiving the foregoing objections, FPL will provide a response reflecting a reasonable set of documents.

16. All documents concerning the cost incurred by FPL to negotiate and obtain easements or rights-of-way that authorize Verizon's use of an FPL-owned pole but not a CLEC or cable company's use of the FPL-owned pole, including all copies of the easements and rights-of-way.

OBJECTION:

FPL objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing, and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." and also that FPL has no duty to create documents where none exist in the ordinary course of business. In addition, it is simply not possible to review the innumerable easements in FPL's property records and provide all such easements responsive to this request. Subject to and without waiving the foregoing objections, FPL will provide a response reflecting a reasonable set of documents.

17. All documents concerning poles abandoned by FPL, including all documents concerning notice to Verizon of FPL's intent to abandon the pole and all documents concerning ownership of the pole after it was abandoned by FPL.

OBJECTION:

FPL objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing, and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." In addition, FPL objects because such documents have previously been provided to Verizon. Subject to and without waiving the foregoing objections, FPL will provide a response reflecting a reasonable set of documents.

18. All documents concerning FPL's invoicing and collection of pole bonding costs from CLECs and cable companies, including all documents concerning the statement on page 22 of FPL's Response and at paragraph 23 of Mr. Kennedy's Declaration that "pole bonding costs

approximately $200 per pole," and all documents concerning the estimate at paragraph 23 of Mr. Kennedy's Declaration that "there are bonds on one-fourth of the joint use poles Verizon and FPL share."

OBJECTION:

FPL objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing, and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." Subject to and without waiving the foregoing objections, FPL will provide a response reflecting a reasonable set of documents.

19. All documents concerning FPL's invoicing and collection of unauthorized attachment fees from CLECs and cable companies.

OBJECTION:

FPL objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing, and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." This request is also not reasonably limited with respect to time or attaching entities. Subject to and without waiving the foregoing objections, FPL will provide a response reflecting a reasonable set of documents.

20. All documents concerning FPL's invoicing and collection of annual pole rent from CLECs and cable companies as referenced on page 24 of FPL's Response, including all documents concerning the date of the invoice, the rental rate invoiced, the date of payment, and the amount paid.

OBJECTION:

FPL objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing, and not reasonably calculated to lead to the discovery of admissible evidence. Documents evidencing the details of FPL's invoices to and payments from attachers are unnecessary in this matter, particularly because Verizon has asked for the amounts charged and paid in interrogatories. This request is also not reasonably limited with respect to time or attaching entities. FPL will therefore not be providing a substantive response to this request.

21. All documents concerning FPL's calculation of the rental rate under the Joint Use Agreement, including all documents concerning the components of the rental rate, the figures appearing in the table at Attachment C to Exhibit G of the Response, and the methodology used.

OBJECTION:

FPL objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing, and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." In addition, FPL objects on the basis that such documents were previously produced to Verizon in the state court litigation.

22. All documents concerning the calculation of the $9.31, $9.78, $11.54, $14.11, $14.29, $14.83, $17.49, $19.78, $21.65, $23.08, $29.97, $34.98, $45.45, $46.16, and $69.96 rates referenced on pages 29 and 43 of FPL's Response and at paragraphs 25 and 26 of Mr. Spain's Affidavit.

OBJECTION:

FPL objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing, and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." Subject to and without waiving the forgoing objections, FPL will provide a response.

23. All documents concerning the calculation of each and every figure in the table on page 15 of Mr. Kennedy's Declaration at paragraph 32.

OBJECTION:

FPL objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing, and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." Subject to and without waiving the forgoing objections, FPL will provide a response.

24. All documents establishing each and every instance in which Verizon's facilities use four feet of an FPL-owned pole as alleged on page 42 of FPL's Response.

OBJECTION:

FPL objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing, and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." In addition, this request would require FPL to create new documents that do not currently exist. Subject to and without waiving the forgoing objections, FPL will provide a response.

25. All documents concerning the statement at paragraph 34 of Mr. Kennedy's Declaration that "the total paid by Verizon [is] less than $50 million," including all documents concerning the inputs and calculation attached as Exhibit 4 to Mr. Kennedy's Declaration.

OBJECTION:

FPL objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing, and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." Subject to and without waiving the forgoing objections, FPL will provide a response.

26. All documents concerning the statement at paragraph 18 of Mr. Spain's Declaration that "Verizon has sold a substantial number of access lines and related property, plant and equipment to Frontier Communications at an average price of approximately $1,638 per access line."

OBJECTION:

FPL objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing, and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." Subject to and without waiving the forgoing objections, FPL will provide a response.

27. All documents concerning the assumption at paragraph 19 of Mr. Spain's Affidavit that Verizon's cost of capital is 5.6%.

OBJECTION:

FPL objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing, and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." Subject to and without waiving the forgoing objections, FPL will provide a response.

28. All documents concerning the statement at paragraph 24 of Mr. Spain's Affidavit that "FPL records indicate that the average age of a 35', 40', or 45' wood pole that was replaced from 2010 to 2014 is 36 years. This means that of the 65,526 wood poles to which Verizon was attached in 2013, approximately 1,820 are replaced by a new pole each year."

OBJECTION:

FPL objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing, and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." Subject to and without waiving the forgoing objections, FPL will provide a response.

29. All documents, including all internal communications, concerning the statement on page 48 of FPL's Response that "after the Dismissal Order, FPL requested several times that Verizon engage in the required good faith executive-level negotiations prior to filing a follow-on complaint and also that Verizon provide documentation that supports its position so that FPL might be in a position to better understand and discuss the disputed issues."

OBJECTION:

FPL objects to this request as it seeks privileged, attorney-client communications and work product. FPL also objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." FPL's internal communications have no relationship to the facts alleged. Additionally, Verizon's

counsel received the referenced documents and thus already is in possession of them. Subject to and without waiving the forgoing objections, FPL will provide a response.

30. All documents, including all internal communications, concerning the statement on page 49 of FPL's Response that "no [Verizon] executives were present" at the parties' January 27, 2012 meeting and that it was "[t]o FPL's dismay" that "none of the January 27, 2012 Verizon attendees were present" at the parties' October 15, 2012 meeting.

OBJECTION:

FPL objects to this request as it seeks privileged, attorney-client communications and work product. FPL also objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." Subject to and without waiving the forgoing objections, FPL will provide a response if FPL is in possession of any documents response to this request.

31. All documents, including all internal communications, concerning the statement on page 50 of FPL's Response that "[t]he lack of executive personnel-and lack of continuity in non-executive personnel-in the meetings between the parties was an obstacle to productive discussions."

OBJECTION:

FPL objects to this request as it seeks privileged, attorney-client communications and work product. FPL also objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." FPL's internal communications have no relationship to the facts alleged. Subject to and without waiving the forgoing objections, FPL will provide a response if FPL is in possession of any documents response to this request.

32. All documents, including all internal communications, concerning the statement on page 50 of FPL's Response that "[t]here has been no legitimate process to engage in comprehensive, informed settlement discussions."

OBJECTION:

FPL objects to this request as it seeks privileged, attorney-client communications and work product. FPL also objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." FPL's internal communications have no relationship to the facts alleged. Subject to and without waiving the forgoing objections, FPL will provide a response if FPL is in possession of any documents response to this request.

33. All documents, including all internal communications, concerning the statement on page 50 of FPL's Response that "FPL personnel have had to re-explain facts and positions to new people who appeared to have no understanding of what had already been discussed."

OBJECTION:

FPL objects to this request as it seeks privileged, attorney-client communications and work product. FPL also objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." FPL's internal communications have no relationship to the facts alleged. Subject to and without waiving the forgoing objections, FPL will provide a response if FPL is in possession of any documents response to this request.

34. All documents, including all internal communications, concerning the statement on page 50 of FPL's Response that "it was clear FPL was not dealing with Verizon decision-makers."

OBJECTION:

FPL objects to this request as it seeks privileged, attorney-client communications and work product. FPL also objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." FPL's internal communications have no relationship to the facts alleged. Subject to and without waiving the forgoing objections, FPL will provide a response if FPL is in possession of any documents response to this request.

35. All documents, including all internal communications, concerning the statement on page 50 of FPL's Response that FPL "on at least three occasions took the initiative to attempt to engage in executive level discussions."

OBJECTION:

FPL objects to this request as it seeks privileged, attorney-client communications and work product. FPL also objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." FPL's internal communications have no relationship to the facts alleged. Additionally, Verizon's counsel received the referenced documents and thus already is in possession of them. Subject to and without waiving the forgoing objections, FPL will provide a response.

36. All documents, including all internal communications, concerning the statement on page 50 of FPL's Response that "an exchange between an FPL executive and a Verizon executive" in April 2013 was "brief' and "confirmed that no resolution could be achieved" because "Verizon had no interest in moving in that direction."

OBJECTION:

FPL objects to this request as it seeks privileged, attorney-client communications and work product. FPL also objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." FPL's internal communications have no relationship to the facts alleged. Subject to and without waiving the forgoing objections, FPL will provide a response if FPL is in possession of any documents response to this request.

37. All documents, including all internal communications, concerning the statement on page 50 of FPL's Response that "FPL made clear that while it must preserve its legal rights, it did not believe that litigation was mutually exclusive of settlement negotiations."

OBJECTION:

FPL objects to this request as it seeks privileged, attorney-client communications and work product. FPL also objects to this request on the grounds that it is overbroad, unduly

burdensome, oppressive, harassing and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." FPL's internal communications have no relationship to the facts alleged. Subject to and without waiving the forgoing objections, FPL will provide a response if FPL is in possession of any documents response to this request.

38. All documents, including all internal communications, concerning the statement on page 51 of FPL's Response that FPL requested "settlement discussions . . . at the executive level" on May 3, 2013, May 21, 2013, May 29, 2013, and October 29, 2013, and that Verizon rejected FPL's requests.

OBJECTION:

FPL objects to this request as it seeks privileged, attorney-client communications and work product. FPL also objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing and not reasonably calculated to lead to the discovery of admissible evidence in light of the definition and use of the term "concerning." FPL's internal communications have no relationship to the facts alleged. Subject to and without waiving the forgoing objections, FPL will provide a response.

39. All documents you reviewed or consulted in preparing FPL's answers to the Interrogatories and Requests for Production of Documents that Verizon served in this Pole Attachment Complaint proceeding.

OBJECTION:

FPL objects to this request on the grounds that it is overbroad, unduly burdensome, oppressive, harassing and not reasonably calculated to lead to the discovery of admissible evidence and incorporates herein all objections to the foregoing requests and all objections made in response to Verizon's interrogatories to FPL. Subject to and without waiving the forgoing objections, FPL will provide a response.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on July 16, 2015, I caused a copy of the foregoing **Florida Power and Light Company's Objections to Verizon Florida's Requests for Production of Documents** to be served on the following by hand delivery, U.S. mail or electronic mail (as indicated):

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