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August 21, 1998

Ms. Blanca S. Bayo, Director
Division of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 980696-TP
Determination of the cost of basic local telecommunications service,
pursuant to Section 364.025, Florida Statutes

Dear Ms. Bayo:

Please find enclosed for filing an original and fifteen copies of GTE Florida Incorporated's Objections to AT&T's Fourth Set of Interrogatories and Fourth Request for Production of Documents in the above matter. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at (813) 483-2617.

Very truly yours,

Kimberly Caswell
Kimberly Caswell

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[Signature]
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A part of GTE Corporation

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the cost of)	Docket No. 980696-TP
basic local telecommunications service)	Filed: August 21, 1998
service pursuant to Section 364.025)	
Florida Statutes)	
_____)	

**GTE FLORIDA INCORPORATED'S OBJECTIONS TO
AT&T'S FOURTH SET OF INTERROGATORIES (63-70) AND
FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS (33-41)**

GTE Florida Incorporated (GTEFL) files its preliminary objections to the Fourth Set of Interrogatories and Fourth Request for Production of Documents served upon GTEFL by AT&T Communications of the Southern States, Inc. (AT&T). GTEFL reserves the right to make additional and/or more complete objections when it files its responses to AT&T's Third Set of Interrogatories as additional grounds for objection may be revealed as GTEFL prepares its discovery responses.

GENERAL OBJECTIONS

Each of the general objections set forth below is incorporated into each of the specific responses and objections.

1. GTE Florida Incorporated (GTEFL) objects to AT&T's definition of "GTE" to the extent it includes GTEFL's affiliates, parents, subsidiaries, agents, representatives, and all other entities that are not GTEFL. The purpose of this proceeding, as set forth in Florida Statutes section 364.025(4)(b), is to choose a proxy model to determine the forward-looking cost of basic local telecommunications service. Only GTEFL's costs and associated information are relevant to this purpose. GTEFL will thus respond to AT&T's discovery only on behalf of GTEFL.

2. GTEFL objects to AT&T's discovery to the extent that it seeks information which is obtainable from some other source that is more convenient, less burdensome, or less expensive.

3. GTEFL objects to AT&T's discovery to the extent that it seeks the identification of documents or portions of documents protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or immunity. The inadvertent production of any privileged document shall not be deemed to be a waiver of any applicable privilege with respect to such document or to the subject matter of the document. GTEFL specifically reserves the right to demand the return of any such privileged documents, without prejudice to any claim of privilege, in the event any such document is inadvertently produced.

4. GTEFL's later responses to the interrogatories and document requests will be made subject to, qualified by, and made without waiver of each of the foregoing general objections.

SPECIFIC OBJECTIONS

Interrogatories

Objection to 63.a, c, and d: GTE objects to these Interrogatories because it would be unduly burdensome for GTE to perform the requested breakout by FCC Part 32 account. GTE can break down dollars by expense category. GTE does not believe any further level of detail would be necessary or relevant to any purpose in this proceeding and objects on that basis, as well.

Objection to 63g: GTE objects to this Interrogatory because it seeks information that is proprietary and competitively sensitive and because it is irrelevant. Mr. Olson's direct testimony and Exhibit SAO-1 reflect all adjustments necessary to obtain a true financial picture of operations for 1997. Nothing more is necessary.

Objection to 64: GTE objects to this Interrogatory to the extent it requires detail by FCC Part 32 account. Please refer to the objection to Interrogatory 63g.

Objection to 67.a: GTE objects to this Interrogatory because it seeks information reflected in a publicly filed document (the C.A. Turner Index) that is not, in any case, prepared by GTE. Please see the Direct Testimony of Michael R. Norris at pages 5-6.

Objection to 69.d: GTE objects to this Interrogatory because it seeks confidential and proprietary information. In addition, GTE objects because the information sought is not relevant to any issue in this proceeding.

Requests for Production of Documents

Objection to 33: Please see GTE's objections, above, to Interrogatory 63, subparts a, c, d, and e.

Objection to 35.a: GTE objects to this Document Request because it seeks documents that are publicly available, as the question itself notes.

Objection to 40: GTE objects to this Document Request, to the extent that it requires a copy of ICM and all documentation supporting the model, because such a request is irrelevant and not calculated to lead to the discovery of any relevant information. GTE has not filed ICM in this proceeding, so there is no reason why GTE should respond to this broad request from AT&T. No ICM outputs were used as inputs to BCPM. GTE will provide the documentation supporting the development of the BCPM inputs, which is the only relevant information.

Respectfully submitted on August 21, 1998.

By: 
for Kimberly Caswell
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Telephone: 813-483-2617

Attorney for GTE Florida Incorporated

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Objections to AT&T's Fourth Set of Interrogatories and Fourth Request for Production of Documents in Docket No. 980696-TP were sent via overnight delivery(*) or U.S. mail on August 21, 1998 to the parties on the attached list.


for Kimberly Caswell

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