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August 28, 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:

These are GTE Florida Incorporated's (GTE) preliminary objections to the Commission Staff's Second Set of Interrogatories. These objections came to light as GTE was preparing to respond to the Interrogatories. GTE reserves the right to make additional objections when it files its responses to Staff's discovery.

- ACK _____
- AFA 1 GTE objects to Interrogatories 20-24 because they are not relevant to GTE's filing in this case or its depreciation practices. The questions ask about Fisher/Pry analysis.
- APP _____ GTE does not use the Fisher/Pry analysis in developing its economic lives for
- CAF _____ depreciation purposes and did not use it for any purpose in this docket. Thus, GTE
- CMU 1 cannot answer these questions. If GTE hired a consultant to answer the Fisher/Pry
- CTR _____ conceptual questions, it would cost an estimated \$600-\$1000. GTE thus objects to
- EAG _____ these Interrogatories on the additional ground that they are unduly burdensome and
- LEG 1 oppressive.
- LIN _____
- QPC _____
- RCH _____
- SEC 1 A part of GTE Corporation
- WAS _____
- OTH _____

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Blanca S. Bayo
August 28, 1998
Page 2

GTE also objects to Interrogatory 39, which asks for completion of a schedule to show DCF results and other information. GTE objects to this question because it is not relevant to GTE's filing. The type of analysis sought in the question was not relied upon by GTE witness Vander Weide in determining the appropriate cost of capital to be input into the cost model in this proceeding, nor is it relevant in any way to Dr. Vander Weide's testimony or any other aspect of GTE's filing in this docket.

If you have any questions, please contact me.

Sincerely,


Kimberly Caswell

KC:tas

c: Parties of Record