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September 2, 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 Staff's Third Set of Interrogatories and Third 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

A part of GTE Corporation

RECEIVED & FILED

EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

09629 SEP-4 98

EPSC-RECORDS/REPORTING

- ACK
- AFA 2
- APP _____
- CAF _____
- CMU Key
- CTR _____
- EAG _____
- LEG 2 KC:tas
- LIN 5 Enclosures
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the cost of)	Docket No. 980696-TP
basic local telecommunications service)	Filed: September 2, 1998
service pursuant to Section 364.025)	
Florida Statutes)	
_____)	

**GTE FLORIDA'S OBJECTIONS TO STAFF'S
THIRD SET OF INTERROGATORIES (NOS. 40-74) AND
STAFF'S THIRD REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 22-47)**

GTE Florida Incorporated (GTEFL) files its preliminary objections to the Staff's Third Set of Interrogatories and Third Request for Production of Documents, both served upon GTEFL on August 28, 1998. GTEFL reserves the right to make additional or different objections when it files its responses to AT&T's Third Set of Interrogatories, as these additional or different objections may come to light as GTEFL prepares its responses to Staff's discovery.

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 the Interrogatories and Document Requests to the extent that they request information from or about GTEFL's affiliates. 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 Staff's discovery only as to GTEFL.

2. GTEFL objects to the Staff's discovery to the extent that it seeks information which is obtainable from some other source that is more convenient, less burdensome, or

DOCUMENT NUMBER-DATE

09629 SEP-4 88

FILED IN THE OFFICE OF THE CLERK OF THE COMMISSION

GTE Florida's Objections to
Staff's 3rd Set of Interrogatories and
3rd Request for Production
Page 2

less expensive.

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

Respectfully submitted on September 2, 1998.

By:



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Attorney for GTE Florida Incorporated

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Objections to Staff's Third Set of Interrogatories and Third Request for Production of Documents in Docket No. 980696-TP were sent via overnight delivery on September 1, 1998(*) or U.S. mail on September 2, 1998 to the parties on the attached list.



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