ORIGINAL

MEMORANDUM

November 29, 1999

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TO: DIVISION OF RECORDS AND REPORTING

FROM: DIVISION OF LEGAL SERVICES (CLEMONS)

RE:

DOCKET NO. 990861-TL - COMPLAINT OF CALVIN "BILL" WOOD

AGAINST GTE FLORIDA INCORPORATED REGARDING SERVICE.

Attached are documents to be filed in the above-referenced docket.

DMC/anc Attachment

AFA .	
APP	
CAF	
CMU	
CTR	
EAG	
LEG	
MAS	
OPC	
PAI	
SEC	
WAW	
OTH	

524- NOV 29 8

Commissioners: JOE GARCIA, CHAIRMAN J. TERRY DEASON SUSAN F. CLARK JULIA L. JOHNSON E. LEON JACOBS, JR.



DIVISION OF LEGAL SERVICES NOREEN S. DAVIS DIRECTOR (850) 413-6199

Public Service Commission

October 29, 1999

Division of Administrative Hearings Ms. Ann Cole, Clerk 1230 Apalachee Parkway Tallahassee, FL 32399

Re:

Case No. 99-3595 - Calvin "Bill" Wood, Petitioner, vs. GTE Florida, Inc.,

Respondent and Florida Public Service Commission, Intervenor

Dear Ms. Cole:

Enclosed for filing are the original and one copy of the Notice of Service of Intervenor's First Request for Production of Documents (No. 1) to GTE Florida, Inc. in the above case. Please date stamp the additional copy and return in the enclosed postage paid envelope. Thank You.

Sincerely,

am. Clevoret

Staff Attorney

DMC:ac

Division of Records and Reporting cc:



Internet E-mail: contact@psc.state.fl.us

CALVIN "BILL" WOOD,)		
Petitioner,)		
vs.)	CASE NO.	99-3595
GTE FLORIDA, INC.)		
Respondent,)		
and)		
PUBLIC SERVICE COMMISSION,)		
Intervenor.)		
)		

INTERVENOR'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 1) TO GTE FLORIDA, INC.

Pursuant to Rule 1.350, Florida Rules of Civil Procedure, the Florida Public Service Commission, by and through its undersigned attorney, hereby serves the following Request for Production of Documents upon GTE Florida, Inc.

Please produce the following documents at the Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, no later than thirty days after service of this request for the purpose of inspection and copying.

DEFINITIONS

As used herein, the word "documents" shall mean the original and any non-identical copies of any writing or record, including

INTERVENOR'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 1) TO GTE FLORIDA, INC.

CASE NO. 99-3595
PAGE 2

but not limited to a book, pamphlet, periodical, letter, memorandum, telegram, report, study, interoffice or intraoffice, handwritten or other notes, working paper, draft, application, permit, chart, paper, graph, survey, index, tape, disc, data sheet or data processing card, computer printout, or any other written, recorded, transcribed, filed or graphic matter, however produced or reproduced.

DOCUMENTS REQUESTED

1. Please provide a copy of all service repair reports for any and all of Mr. Wood's GTE telephone accounts from January 1, 1996 to the present. Please include a detailed practice which explains the report codes.

> DONNA M. CLEMONS Staff Counsel

FLORIDA PUBLIC SERVICE COMMISSION Gerald L. Gunter Building 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 (850) 413-6199

CALVIN "BILL" WOOD,)
Petitioner,)
vs.) CASE NO. 99-3595
GTE FLORIDA, INC.,)
Respondent,)
and)
PUBLIC SERVICE COMMISSION,)
Intervenor.)

NOTICE OF SERVICE OF INTERVENOR'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 1) TO GTE FLORIDA, INC.

NOTICE IS HEREBY GIVEN that the Florida Public Service Commission, by and through its undersigned attorney, has served the original and one copy of Intervenor's First Request for Production of Documents (No. 1) to GTE Florida, Inc. via facsimile and U.S. Mail upon Kimberly Caswell, Esq., [Facsimile Nos. (813)204-8870 and (813)360-0716], Post Office Box 110 FLTC0616, Tampa, Florida 33601-0110, on behalf of GTE Florida, Inc.

Horam. Clevery

DONNA M. CLEMONS Staff Counsel

FLORIDA PUBLIC SERVICE COMMISSION Gerald L. Gunter Building 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 (850) 413-6199

CALVIN "BILL" WOOD,)
Petitioner,)
vs.) CASE NO. 99-3595
GTE FLORIDA, INC.,)
Respondent,)
and)
PUBLIC SERVICE COMMISSION,)
Intervenor.)
)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Notice of Service of Intervenor's First Request for Production of Documents (No. 1) to GTE Florida, Inc. has been furnished via facsimile and U.S. Mail to Kimberly Caswell, Esquire, [Facsimile Nos. (813) 204-8870 and (813) 360-0716], GTE Florida, Inc., Post Office Box 110 FLTC0616, Tampa, Florida 33601-0110, and by U.S. Mail this 29th day of October, 1999, to the following:

Calvin "Bill" Wood 10577 Schaefer Lane Lake Wales, Florida 33853 Debby B. Kampert GTE Florida, Inc. One Tampa City Center Post Office Box 110, FLTC0616 Tampa, Florida 33601-0110 INTERVENOR'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 1) TO GTE FLORIDA, INC. CASE NO. 99-3595
PAGE 5

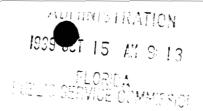
Joy Kelly, Bureau Chief, Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Calvin "Bill" Wood Post Office Box 6352 Nalcrest, Florida 33856-6352

Donna M. Clevors

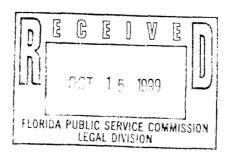
DONNA M. CLEMONS Staff Counsel

FLORIDA PUBLIC SERVICE COMMISSION Gerald L. Gunter Building 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 (850) 413-6199



DONNA CLEMONS ESQUIRE
PUBLIC SERVICE COMMISSION
2540 SHUMARD OAK BLVD
TALLAHASSEE FL 32399-0850

99-3595



CALVIN "BILL" WOOD,	
Petitioner,	
vs.	Case No. 99-3595
GTE FLORIDA, INC.,	
Respondent,	
and)	
PUBLIC SERVICE COMMISSION,	
Intervenor.)	

ORDER OF PRE-HEARING INSTRUCTIONS

This cause having been scheduled for final hearing, it is, therefore,

ORDERED that:

- 1. Counsel for all parties shall meet no later than 15 days prior to the date for final hearing in this cause and shall:
 - (a) Discuss the possibility of settlement;
 - (b) Stipulate to as many facts and issues as possible;
 - (c) Prepare the pre-hearing stipulation as required by this Order;
 - (d) Examine all exhibits (except for impeachment exhibits) proposed to be offered into evidence at the hearing;
 - (e) Furnish opposing counsel the names and addresses of all witnesses (except for impeachment witnesses); and
 - (f) Complete all other matters which may expedite the hearing in this case.

- 2. Counsel for Intervenor shall initiate arrangements for the attorneys' conferences. However, all attorneys in this cause are charged with the duty of meeting in such conferences and of complying with the schedule set forth in this Order.
 - 3. The pre-hearing stipulation shall contain:
 - (a) A concise statement of the nature of the controversy;
 - (b) A brief, general statement of each party's position;
 - (c) A list of all exhibits (except for impeachment exhibits) to be offered at the hearing, noting any objections thereto, and the grounds for each objection;
 - (d) A list of the names and addresses of all witnesses (except for impeachment witnesses) to be called at the hearing by each party, with expert witnesses being so designated;
 - (e) A concise statement of those facts which are admitted and will require no proof at hearing, together with any reservations directed to such admission;
 - (f) A concise statement of those issues of law on which there is agreement;
 - (g) A concise statement of those issues of fact which remain to be litigated;
 - (h) A concise statement of those issues of law which remain for determination by the Administrative Law Judge;
 - (i) A concise statement of any disagreement as to the application of the rules of evidence;
 - (j) A list of all pending motions or other matters, which require action by the Administrative Law Judge;
 - (k) An estimate as to the length of time required for the hearing; and
 - (1) The signature of counsel for all parties.

ROOM CONFIRMATION COPY:

Dolly Pelletier, City Manager's Office City Hall 152 East Central Avenue Lake Wales, Florida 33853 (863) 678-4191 SUNCOM 515-3586

In accordance with the Americans with Disabilities Act, persons needing a special accommodation to participate in this proceeding should contact the Judge's secretary no later than seven days prior to the hearing. The Judge's secretary may be contacted at the address or telephone numbers above, via 1-800-955-8771 (TDD), or 1-800-955-8770 (Voice) Florida Relay Service.

CALVIN "BILL" WOOD,)
Petitioner,	,
vs.	Case No. 99-3595
GTE FLORIDA, INC.,))
Respondent,)
and))
PUBLIC SERVICE COMMISSION,)))
Intervenor.)	· }

NOTICE OF HEARING

A hearing will be held in this case at the City Hall, Second Floor Commission Chambers, 152 East Central Avenue, Lake Wales, Florida, on December 8, 1999, at 9:00 a.m., or as soon thereafter as can be heard. Continuances will be granted only by order of the Administrative Law Judge for good cause shown.

ISSUE: As set forth in the Complaint.

<u>AUTHORITY</u>: Chapter 120, Florida Statutes; and Chapter 28-106, Parts I and II, Florida Administrative Code.

The parties shall arrange to have all witnesses and evidence present at the time and place of hearing. Subpoenas will be issued by the Administrative Law Judge upon request of the parties. All parties have the right to present oral argument and to cross-examine opposing witnesses. All parties have the right to be represented by counsel or other qualified representative, in accordance with Rule 28-106.106, Florida

Administrative Code. Failure to appear at this hearing may be grounds for entry of an order of dismissal or recommended order of dismissal, as appropriate.

October 3, 1999

WILLIAM F. QUATTLEBAUM
Administrative Law Judge
Division of Administrative Hearings
The DeSoto Building
1230 Apalachee Parkway
Tallahassee, Florida 32399-3060
(850) 488-9675 SUNCOM 278-9675
Fax Filing (850) 921-6847
www.doah.state.fl.us

COPIES FURNISHED:

Kimberly Caswell

GTE Florida, Inc.

Post Office Box 110 FLTC0616

Tampa, Florida 33601-0110

Donna Clemons, Esquire Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Debby B. Kampert
GTE Florida, Inc.
One Tampa City Center
Post Office Box 110, FLTC0616
Tampa, Florida 33601-0110

Joe Kelly, Bureau Chief Reporting Florida Public Service Commission 2450 Shummard Oak Boulevard Tallahassee, Florida 32399-0850

Calvin "Bill" Wood 10577 Schaefer Lane Lake Wales, Florida 33853

Calvin "Bill" Wood
Post Office Box 6352
Nalcrest, Florida 33856-6352

Service

4. The parties shall file their pre-hearing stipulation no later than 10 days prior to the date set for final hearing in this cause. If for any reason the pre-hearing stipulation cannot be executed by all counsel, each attorney shall file and serve a separate proposed pre-hearing statement not later than 10 days before the final hearing with a statement of reasons why no agreement was reached on the stipulation. Failure to comply with the requirements of this Order may result in cancellation of the hearing on the Administrative Law Judge's own motion, or may result in the exclusion of witnesses or exhibits not previously disclosed.

DONE AND ORDERED this 13 day of October, 1999, in Tallahassee, Leon County, Florida.

WILLIAW F. QUATTLEBAUM
Administrative Law Judge
Division of Administrative Hearings
The DeSoto Building
1230 Apalachee Parkway
Tallahassee, Florida 32399-3060
(850) 488-9675 SUNCOM 278-9675
Fax Filing (850) 921-6847
www.doah.state.fl.us

Filed with the Clerk of the Division of Administrative Hearings this 13 day of October, 1999.

COPIES FURNISHED:

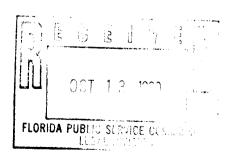
Kimberly Caswell GTE Florida, Inc. Post Office Box 110 FLTC0616 Tampa, Florida 33601-0110 Donna Clemons, Esquire
Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Debby B. Kampert GTE Florida, Inc. One Tampa City Center Post Office Box 110, FLTC0616 Tampa, Florida 33601-0110

Joe Kelly, Bureau Chief Reporting Florida Public Service Commission 2450 Shummard Oak Boulevard Tallahassee, Florida 32399-0850

Calvin "Bill" Wood 10577 Schaefer Lane Lake Wales, Florida 33853

Calvin "Bill" Wood Post Office Box 6352 Nalcrest, Florida 33856-6352 DONNA CLEMONS
PUBLIC SERVICE COMMISSION
2540 SHUMARD OAK BLVD
TALLAHASSEE FL 32399-0850



CALVIN "BILL" WOOD,)
Petitioner,))
vs.) Case No. 99-3595
GTE FLORIDA, INC.,)
Respondent,)
and)
PUBLIC SERVICE COMMISSION,)
Intervenor.)

ORDER GRANTING MOTION FOR LEAVE TO INTERVENE

This matter comes on for review of the Motion for Leave to Intervene and the Amended Motion for Leave to Intervene filed by the Florida Public Service Commission. The Petitioner has filed his objection to the Motions.

Upon review of the Motions and the Petitioner's objections, it is hereby

ORDERED that:

The Public Service Commission Motions to Intervene are GRANTED.

DONE AND ORDERED this 12th day of October, 1999, in

Tallahassee, Leon County, Florida.

WILLIAM F. QUATTLEBAUM
Administrative Law Judge
Division of Administrative Hearings
The DeSoto Building
1230 Apalachee Parkway
Tallahassee, Florida 32399-3060
(850) 488-9675 SUNCOM 278-9675
Fax Filing (850) 921-6847
www.doah.state.fl.us

Filed with the Clerk of the Division of Administrative Hearings this 12th day of October, 1999.

COPIES FURNISHED:

Calvin "Bill" Wood Post Office Box 6352 Nalcrest, Florida 33856-6352

Calvin "Bill" Wood 10577 Schaefer Lane Lake Wales, Florida 33853

Donna Clemons, Esquire Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Debby B. Kampert GTE Florida, Inc. Post Office Box 110 FLTC0616 Tampa, Florida 33601-0110

Kimberly Caswell GTE Florida, Inc. Post Office Box 110 FLTC0616 Tampa, Florida 33601-0110

Joy Kelly Bureau Chief of Reporting Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Commissioners:
JOE GARCIA, CHAIRMAN
J. TERRY DEASON
SUSAN F. CLARK
JULIA L. JOHNSON
E. LEON JACOBS, JR.



DIVISION OF TELECOMMUNICATIONS WALTER D'HAESELEER DIRECTOR (850) 413-6600

Public Service Commission

September 20, 1999 **CERTIFIED**

Ms. Beverly Menard Director - Regulatory and Industry Affairs GTE Florida c/o Mr. David Christian 106 East College Avenue, Suite 810 Tallahassee, Florida 32301-7704



Re: September 16, 1999 request concerning Docket 990861-TL

Dear Ms. Menard:

I have been informed that all requests for information have to be forwarded through the Division of Administrative Hearings. Therefore, please disregard the request made on September 16, concerning this matter.

Thank you,

Clayton Lewis

Engineer III

Bureau of Service Evaluation

Enclosure

September 16, 1999 staff request

cc:

R. Moses - CMU

D. Clemons - LEG

L. Fulwood - CMU

K. Smith - CAF

Commissioners:
JOE GARCIA, CHAIRMAN
J. TERRY DEASON
SUSAN F. CLARK
JULIA L. JOHNSON
E. LEON JACOBS, JR.



DIVISION OF TELECOMMUNICATIONS WALTER D'HAESELEER DIRECTOR (850) 413-6600

Public Service Commission

September 16, 1999 **CERTIFIED**

Ms. Beverly Menard
Director Regulatory and Industry Affairs
GTE Florida
c/o Mr. David Christian
106 East College Avenue, Suite 810
Tallahassee, Florida 32301-7704

Re: Docket 990861-TL - Complaint of Calvin Wood against GTE Florida, Inc. Regarding service.

Dear Ms. Menard:

The Commission has referred this docket to the Division of Administrative Hearings. Therefore, we need to acquire a more extensive account history to prepare for the upcoming hearing.

The provide acry of all service and appeir reports for Mr. Wood's account from learning.

The provide acry of all service and appeir reports for Mr. Wood's phone number is (941) 696-9542.

Please provide the requested information by October 15, 1999. Should you have any questions, please contact me at (850) 413-6578 or fax (850) 413-6579 or Internet mail clewis@psc.state.fl.us.

Sincerely,

Clayton Lewis

Engineer III

Bureau of Service Evaluation

cc:

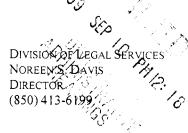
D. Clemons - LEG

L. Fulwood - CMU

K. Smith - CAF

Commissioners:
JOE GARCIA, CHAIRMAN
J. TERRY DEASON
SUSAN F. CLARK
JULIA L. JOHNSON
E. LEON JACOBS, JR.





Public Service Commission

September 9, 1999

Division of Administrative Hearings Ms. Ann Cole, Clerk 1230 Apalachee Parkway Tallahassee, Florida 32399

RE: Case No. 99-3595 - Calvin "Bill" Wood, Petitioner, vs. GTE Florida, Inc., Respondent

Dear Ms. Cole:

Enclosed for filing are the original and one copy of the Florida Public Service Commission's Amended Motion for Leave to Intervene in the above case. Please date stamp the additional copy and return in the enclosed postage paid envelope. Thank you.

Sincerely,

Donna M. Clemons

Staff Attorney

DMC:sa Enclosures (2)

cc: Division of Records and Reporting

Division of Communications (Lewis)
Division of Consumer Affairs (Smith)

CAL	/IN "BILL" WOOD Petitioner,)	DOAH	Case	No.	99-3395 99-861-TL
		,				
VS.)				
)				
GTE	FLORIDA, INC.,)				
	Respondent.)				
	-)				

AMENDED MOTION FOR LEAVE TO INTERVENE

COMES NOW the Florida Public Service Commission (Commission), by and through its undersigned counsel, and hereby files this, its Amended Motion for Leave to Intervene, and in support thereof, states as follows:

- 1. On September 2, 1999, the Commission filed its Motion for Leave to Intervene in the above-styled cause, wherein we stated in Paragraph 9 that we had consulted with both parties, pursuant to Rule 28-106.204(3), Florida Administrative Code, and that the Petitioner, Calvin "Bill" Wood, had no objection to our Motion. In this Amended Motion, we have correctly stated Mr. Wood's objection.
- 2. This case was initiated by the filing of a complaint with the Commission by Calvin "Bill" Wood against GTE Florida, Inc. (GTE). Mr. Wood complained of the quality of telephone service provided to his residence by GTE.
- 3. At the Florida Public Service Commission Agenda Conference held July 27, 1999, the Commission voted to refer Mr. Wood's complaint to the Division of Administrative Hearings (DOAH)

for a formal hearing. Section 120.569(2)(a), Florida Statutes, states that once a case is referred to DOAH the "referring agency shall take no further action with respect to the formal proceedings, except as a party litigant," as long as DOAH has jurisdiction over the formal proceeding.

- GTE offers "two-way telecommunications service to the within this public for hire state by the use of facility," and telecommunications is, therefore, telecommunications company as defined in Section 364.02(12), Florida Statutes. Pursuant to Section 364.01(2), Florida Statutes, the Commission has exclusive jurisdiction "in all matters" set forth in Chapter 364 "in regulating telecommunications companies." Thus, the Commission has exclusive jurisdiction over the subject matter of this proceeding, and, therefore, has an interest in the proceeding.
- 5. The Commission is neither an adversary to, nor advocate for, either party. Pursuant to Chapter 364, Florida Statutes, one of the Commission's primary duties is to protect the public interest.
- 6. Pursuant to the Commission's <u>Statement of Agency</u>

 <u>Organization & Operations</u> (1999), subsection entitled "Parties,"

 page 11:

The Commission staff may participate as a party in any proceeding. Their primary duty is to represent the public interest and see that all relevant facts and issues are clearly brought before the Commission for its

consideration.

In cases assigned to the Division of Administrative Hearings, the Commission staff's role is to represent the public interest and be neither in favor nor against any particular party, unless the Commission is enforcing rules or statutes through a show cause or similar proceeding, or unless the Commission is a respondent at the Division of Administrative Hearings. Staff is not a party in interest and has no substantial interests that may be affected by the proceeding. Commission staff's role shall be to assist in developing evidence to ensure a complete record so that all relevant facts and issues are presented to the fact finder. Any position that staff has prior to the hearing is preliminary; final positions are based upon review of the complete record. Commission staff may participate as a party in any proceeding involving the jurisdiction of the Public Service Commission. The Commission staff's primary role is to represent the public interest and be neither in favor or against either party. Staff's primary function in participating in proceedings before the Division of Administrative Hearings is to assist in developing evidence to ensure that all relevant factual, legal, and policy issues are presented to the fact-finder. Staff's final positions will be based upon review of the complete record.

7. The Commission has been granted intervention in similar cases that have been referred to DOAH. See, Blanca Rodriguez v. Florida Power & Light Company, Case No. 96-4935; Thomas L. Fuller v. Florida Power Corporation, Case No. 95-4253; Globe International Realty & Mortgage Corporation v. Florida Power & Light Company, Case No. 95-2514; Jory Bricker v. Florida Power Corporation, Case No. 93-5713; Janet Knauss v. Florida Power & Light Company, Case No. 91-4910; Larry Timm v. Florida Power & Light Company, Case No. 91-2755, Arturo Toboada v. Florida Power & Light Company, Case No. 91-0331.

8. Pursuant to Rule 28-106.204(3), Florida Administrative Code, the undersigned consulted with both parties to the litigation. On August 30, 1999, GTE stated that it had no objection to this motion. Mr. Wood, however, states that he objects to the Commission's intervention in this proceeding due to due process problems.

WHEREFORE, the Florida Public Service Commission respectfully requests that its Motion for Leave to Intervene be granted and the Commission be allowed to intervene in these proceedings while reserving its statement of position pending the evidence developed at the hearing.

Respectfully submitted this 4th day of September, 1999.

day of September, 1999

DONNA M. CLEMONS, ESQUIRE Florida Bar No. 0090948

Florida Public Service Commission

Gerald L. Gunter Building 2540 Shumard Oak Boulevard

Tallahassee, FL 32399

(850) 413-6199

COPIES FURNISHED

GTE Florida, Inc.
Kimberly Caswell, Esq.
P.O. Box 110
Tampa City Center
MC-FLTC0007
Tampa, FL 33601

Ms. Kay Flynn, Chief Bureau of Rec'ds and Rept'g Florida Public Service Comm'n 2540 Shumard Oak Boulevard Tallahassee, FL 32399 Mr. Calvin "Bill" Wood P.O. Box 6352 Nalcrest, FL 33856-6352



Marceil Morrell*
Assistant Vice President &Associate General Counsel-East Area

Anthony P. Gillman*
Assistant General Counsel

Florida Region Counsel**
Kimberly Caswell
M. Eric Edgington
Ernesto Mayor, Jr.
Elizabeth Biemer Sanchez

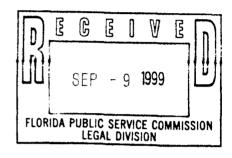
* Certified in Florida as Authorized House Counsel

** Licensed in Florida

Ms. Ann Cole, Clerk
State of Florida
Division of Administrative Hearings
The DeSoto Building
1230 Apalachee Parkway
Tallahassee, FL 32399-3060

GTE SERVICE CORPORATION

One Tampa City Center 201 North Franklin Street (33602) Post Office Box 110, FLTC0007 Tampa, Florida 33601-0110 813-483-2606 813-204-8870 (Facsimile)



September 7, 1999

Re: Calvin "Bill" Wood v. GTE Florida Incorporated

DOAH Case No. 99-3595, 990861-TL

Dear Ms. Cole:

Please find enclosed the original and one copy of a Joint Response to Initial Order for filing in the above matter. Copies have been provided to the parties of record. If there are any questions regarding this matter, please contact me at (813) 483-2617.

Sincerely,

AL Kimberly Caswell

KC:tas Enclosures

c: Donna Clemons, Florida Public Service Commission (w/e)
Debby B. Kampert, GTE Florida Incorporated (w/e)
Calvin "Bill" Wood (w/e)

CALVIN "BILL" WOOD,)	
Petitioner,) DOAH Case No. 99-359	95
Vs.) 990861-Ti	
)	
GTE FLORIDA INC.,)	
Respondent.)	
)	

JOINT RESPONSE TO INITIAL ORDER

GTE Florida Incorporated (GTE) and Mr. Calvin "Bill" Wood file their Joint Response to the Initial Order (Order) in this case. They respond as follows to the questions posed in the Order:

- 1. Neither Petitioner nor Respondent is aware of any related cases before the Division.
 - 2. The estimated hearing time is one work day (about 8 hours).
- 3. Petitioner suggests either Nalcrest or Fedhaven as the hearing location. Petitioner notes that he is aware of facilities that may be used for the hearing, and can suggest those to the Division upon request. Any location within Florida is an acceptable hearing site for Respondent.
- 4. Both Petitioner and Respondent are available on the following days within the time period designated in the Order: November 1-4, 12, and 15-19.

Respectfully submitted on September 7, 1999.

Kimberly Caswell

GTE Florida Incorporated

P. O. Box 110, FLTC0007

Tampa, FL 33601

(813) 483-2617/Fax (813) 204-8870

Calvin "Bill" Wood P. O. Box 6352

Nalcrest, FL 33856-6352

(941) 696-2858 or (941) 696-9542