



ORIGINAL

Kimberly Caswell
Counsel

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)

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RECORDS AND
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June 29, 2000

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

Re: Docket No. 990649-TP
Investigation into Pricing of Unbundled Network Elements

Dear Ms. Bayo:

Please find enclosed for filing in the above matter an original and fifteen copies of GTE Florida Incorporated's Objections to Staff's Fifth Request for Production of Documents. Also enclosed are an original and fifteen copies of GTE Florida Incorporated's Objections to Staff's Fourth Set of Interrogatories. 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.

Sincerely,

Kimberly Caswell

KC:tas
Enclosures

- APP _____
- CAF _____
- CMP 5
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- CTR _____
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- OPC _____
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- RGO _____
- SEC 1
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DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Investigation into pricing of
unbundled network elements

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Docket No. 990649-TP
Filed: June 29, 2000

**GTE FLORIDA INCORPORATED'S OBJECTIONS TO
STAFF'S FOURTH SET OF INTERROGATORIES (NOS. 30-52)**

GTE Florida Incorporated ("GTEFL"), by counsel and pursuant to the procedural order in this case (Order No. PSC-00-0540-PCO-TP), hereby files its initial objections to Staff's Fourth Set of Interrogatories. GTEFL reserves the right to make additional and/or more complete objections when it files its responses to Staff's Fourth Set of Interrogatories.

GENERAL OBJECTIONS

GTEFL generally objects to Staff's Fourth Set of Interrogatories as follows:

1. GTEFL objects to Staff's Fourth Set of Interrogatories to the extent that it seeks the disclosure of information or 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.
2. GTEFL objects to Staff's Fourth Set of Interrogatories to the extent it seeks the disclosure of information not relevant to the subject matter of this action and not reasonably calculated to lead the discovery of admissible evidence.

DOCUMENT NUMBER-DATE

07959 JUN 29 8

FPSC-RECORDS/REPORTING

3. GTEFL objects to Staff's Fourth Set of Interrogatories to the extent it is unduly burdensome, vague, ambiguous, over broad, annoying, harassing or fails to specify clearly the information requested. Moreover, GTEFL objects to Staff's Fourth Set of Interrogatories to the extent that it seeks information that is obtainable from some other source that is more convenient, less burdensome, or less expensive.
4. GTEFL objects to Staff's Fourth Set of Interrogatories to the extent it purports to impose on GTEFL's greater obligations than those imposed by the Florida Rules of Civil Procedure.
5. GTEFL objects to Staff's Fourth Set of Interrogatories to the extent it requires GTEFL to concede the relevance, materiality, or admissibility of the documents sought by each request, as GTEFL reserves its right to raise all such objections in this or any other action.
6. GTEFL's later responses to Staff's Fourth Set of Interrogatories will be made subject to, qualified by, and without waiver of each of the foregoing General Objections and the following Specific Objections.

INTERROGATORIES

GTEFL specifically objects to Staff's Fourth Set of Interrogatories as follows:

30. On page 5 of Mr. Sovereign's testimony, it is inferred that state commissions and GTEFL historically intentionally overestimated depreciation lives to keep prices low. Please provide an example of where depreciation lives were intentionally overestimated in Florida.

31. How many business lines have ALECs captured in the GTEFL exchanges in Florida?
32. How many-residential lines have ALECs captured in the GTEFL exchanges in Florida?
33. Explain in detail how GTEFL factored into its proposed economic lives the threat of bypass by emerging technologies such as wireless local loop technologies.
34. Explain in detail the specifics of how GTEFL determined the proper weighting of the various factors relied on in the determination of its proposed depreciation lives.
35. Explain in detail how GTEFL allocated proper weighting to the NARUC factors of retirement in developing its proposed lives.
36. On page 15 of Mr. Sovereign's testimony, it states that functional factors of retirement have been given substantially greater weight in determining GTEFL's proposed economic lives. Quantify the weight GTEFL has given these factors.
37. Explain in detail how GTEFL's plant compares with AT&T's plant in terms of usage.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad and unduly burdensome. GTEFL further objects to this request on the grounds that the term "plant" is vague and ambiguous.

38. On page 17 of Mr. Sovereign's testimony, it states that the weighted average depreciable life of the assets comprising MCI's system as reported in its 1996 annual report approximates 10 years.
- a) Is GTEFL aware of how MCI developed the weighted average depreciable life? If so, please explain.
 - b) Does GTEFL know what kind of life MCI is referring to in its annual report (average service life, remaining life)? If so, please explain.
 - c) Does GTEFL know whether MCI depreciates its assets using a straight-line method or an accelerated method of depreciation? If so, please explain.
39. Has GTEFL reviewed the statistical analysis of lives used by the FCC in developing the range of lives for CATV distribution facilities? Please explain your response.
40. How does GTEFL's plant compare with CATV distribution facilities? Please explain your response.

OBJECTION: GTEFL objects to this Interrogatory on the grounds that it is overbroad and unduly burdensome. GTEFL further objects to this request on the grounds that the term "plant" is vague and ambiguous.

41. What are the forecasted additions and retirements for the digital switching, digital circuit, fiber electronics, and each of the metallic and fiber cable accounts, by year, for 2000, 2001, and 2002?

OBJECTION: GTEFL objects to this Interrogatory because, to the extent responsive data exists, it is proprietary and highly confidential competitive information. GTEFL further objects to this Interrogatory on the grounds that planning forecast information is irrelevant to selecting a cost model to determine the long run, forward-looking cost of providing unbundled network elements, and is not otherwise relevant to any issue in this proceeding.

42. When does GTEFL plan to no longer add any metallic cable plant?

OBJECTION: GTEFL objects to this Interrogatory because, to the extent responsive data exists, it is proprietary and highly confidential competitive information. GTEFL further objects to this Interrogatory on the grounds that planning information is irrelevant to selecting a cost model to determine the long run, forward-looking cost of providing unbundled network elements, and is not otherwise relevant to any issue in this proceeding.

43. As of January 1, 2000, what is the percentage breakdown of the metallic cable facilities between interoffice, feeder, and distribution? The response provided should also include a detailed explanation as to how this percentage breakdown was determined.

44. Please list the services that cannot be provided over copper facilities.

OBJECTION: GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, vague and ambiguous.

45. What are GTEFL's plans for deploying ADSL or HDSL technologies?

OBJECTION: GTEFL objects to this Interrogatory because, to the extent responsive data exists, it is proprietary and highly confidential competitive information. GTEFL further objects to this Interrogatory on the grounds that planning forecast information is irrelevant to selecting a cost model to determine the long run, forward-looking cost of providing unbundled network elements, and is not otherwise relevant to any issue in this proceeding.

46. What are GTEFL's plans for deploying SONET?

OBJECTION: GTEFL objects to this Interrogatory because, to the extent responsive data exists, it is proprietary and highly confidential competitive information. GTEFL further objects to this Interrogatory on the grounds that planning information is irrelevant to selecting a cost model to determine the long run, forward-looking cost of providing unbundled network elements, and is not otherwise relevant to any issue in this proceeding.

47. How does GTEFL determine when a feeder or distribution transmission facility needs to be replaced?

48. What is the current replacement facility for a retiring copper feeder or distribution transmission facility?

49. When did GTEFL begin deployment of fiber in the feeder portion of the network?

50. When did GTEFL begin deployment of fiber in the distribution portion of the network?

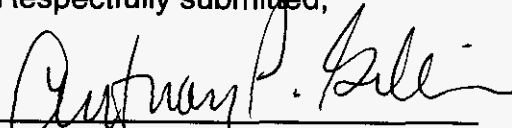
51. What are GTEFL's plans regarding the deployment of ATM switching?

OBJECTION: GTEFL objects to this Interrogatory because, to the extent responsive data exists, it is proprietary and highly confidential competitive information. GTEFL further objects to this Interrogatory on the grounds that planning information is irrelevant to selecting a cost model to determine the long run, forward-looking cost of providing unbundled network elements, and is not otherwise relevant to any issue in this proceeding.

52. What is GTEFL's current deployment strategy for fiber cable in the feeder, interoffice, and distribution portions of the network?

OBJECTION: GTEFL objects to this Interrogatory because, to the extent responsive data exists, it is proprietary and highly confidential competitive information. GTEFL further objects to this Interrogatory on the grounds that planning information is irrelevant to selecting a cost model to determine the long run, forward-looking cost of providing unbundled network elements, and is not otherwise relevant to any issue in this proceeding.

Respectfully submitted,



Kim Kimberly Caswell
GTE Service Corporation
One Tampa City Center
201 North Franklin Street (33602)
Post Office Box 110, FLTC0007
Tampa, Florida 33601-0110

Christopher Huther
Preston Gates Ellis & Rouvelas Meeds, LLP
1735 New York Avenue NW, Suite 500
Washington, DC 20006-5209

COUNSEL FOR GTE FLORIDA
INCORPORATED

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of unbundled network elements)
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_____)

Docket No. 990649-TP
Filed: June 29, 2000

GTE FLORIDA INCORPORATED'S OBJECTIONS TO STAFF'S FIFTH REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 17-31)

GTE Florida Incorporated ("GTEFL"), by counsel and pursuant to the procedural order in this docket (Order No. PSC-00-0540-PCO-TP), hereby files its initial objections to Staff's Fifth Request for Production of Documents. GTEFL reserves the right to make additional and/or more complete objections when it files its responses to Staff's Fifth Set of Document Requests.

GENERAL OBJECTIONS

GTEFL generally objects to Staff's Fifth Set of Document Requests as follows:

1. GTEFL objects to Staff's document requests to the extent they seek 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.
2. GTEFL objects to Staff's document requests to the extent they seek production of documents or disclosure of information not relevant to the subject matter of this action and not reasonably calculated to lead the discovery of admissible evidence.

3. GTEFL objects to Staff's document requests to the extent they are unduly burdensome, vague, ambiguous, overbroad, annoying, harassing or fail to specify clearly the documents requested. Moreover, GTEFL objects to these requests to the extent that they seek information that is obtainable from some other source that is more convenient, less burdensome, or less expensive.

4. GTEFL objects to Staff's document requests to the extent they purport to impose on GTEFL greater obligations than those imposed by the Florida Rules of Civil Procedure.

5. GTEFL objects to Staff's document requests to the extent they require GTEFL to concede the relevance, materiality, or admissibility of the documents sought by each request, as GTEFL reserves its right to raise all such objections in this or any other action.

6. GTEFL's later responses to Staff's Fifth Request for Production of Documents will be made subject to, qualified by, and without waiver of each of the foregoing General Objections and the following Specific Objections.

DOCUMENT REQUESTS

GTEFL specifically objects to Staff's Fifth Request for Production of Documents as follows:

17. Provide a copy of FCC MM Docket No. 93-215 and FCC CS Docket No. 94-28, Second Report and Order, First Order on Reconsideration, and Further Notice of Propose Rulemaking, released January 26, 1996, referenced on page 18 of Mr. Sovereign's testimony.

18. Provide copies of any and all state regulatory commission orders from every state in which BST's depreciation lives, salvage values, and resulting rates have been determined for the purpose of setting rates and charges for the provision of unbundling network elements and services, universal service cost levels, or for any other purpose since January 1, 1996.

OBJECTION: GTEFL objects to this request on the grounds that it is overbroad, unduly burdensome, vague and ambiguous.

19. Provide any and all documents including all planning documents used in the development and determination of the depreciation parameters utilized in GTEFL's cost studies.

OBJECTION: GTEFL objects to this request on the grounds that planning documents contain proprietary and highly confidential competitive information. GTEFL further objects to this request on the grounds that planning information is irrelevant to selecting a cost model to determine the long run, forward-looking cost of unbundled network elements, and is not otherwise relevant to any issue in this proceeding.

20. Provide all material and data including reports, documents, and workpapers used by GTEFL in its benchmarking analyses to help quantify its professional judgement as to economic lives.

21. Please provide each and any document in your possession, custody, or control discussing, evaluating, or forecasting the migration of metallic plant to fiber plant for interoffice, feeder, and distribution plant.

OBJECTION: GTEFL objects to this request on the grounds that it is overbroad and unduly burdensome. GTEFL also objects to this request on the grounds that the term “your” is vague and ambiguous. GTEFL further objects to this request on the grounds that forecasting documents contain proprietary and highly confidential competitive information. GTEFL objects to this request on the grounds that forecast information is irrelevant to selecting a cost model to determine the long run, forward-looking cost of unbundled network elements, and are not otherwise relevant to any issue in this proceeding.

22. Please provide each and any document in your possession, custody, or control discussing, evaluating, or commenting on the impact of SONET on the lives or evolution of current digital or fiber circuit equipment.

OBJECTION: GTEFL objects to this request on the grounds that it is overbroad and unduly burdensome. GTEFL further objects to this request on the grounds that the term “your” is vague and ambiguous.

23. Please provide each and any document in your possession, custody or control, evaluating, analyzing or commenting on GTEFL's forecasts of demand for broadband services.

OBJECTION: GTEFL objects to this request on the grounds that it is overbroad and unduly burdensome. GTEFL further objects to this request on the grounds that the term “your” is vague and ambiguous. GTEFL also objects to this request on the grounds that forecasting documents contain proprietary and highly confidential competitive information, irrelevant to selecting a cost model to determine the long run, forward-looking cost of unbundled network elements, and are not otherwise relevant to any issue in this proceeding.

24. Provide a copy of the California Public Utilities Commission's Decision, No. D.96-08-021, Adopted August 21, 1996, in Rule Making R.93-04-003, I.93-04-002, as referenced on page 21 of Mr. Sovereign's testimony.
25. Provide a copy of the Michigan Commission's Docket No. U- 11281, February 25, 1998 order, Section d, as referenced on page 22 of Mr. Sovereign's testimony.
26. Provide copies of any and all regulatory orders from every state in which GTEFL's depreciation lives, salvage values, and resulting rates has been determined for the purpose of setting rates and charges for the provision of unbundling network elements and services, universal service cost levels, or for any other purpose since January 1, 1998.

OBJECTION: GTEFL objects to this request on the grounds that it is overbroad, unduly burdensome, vague and ambiguous.

27. Provide any and all documents including all planning documents used in the development and determination of the depreciation parameters utilized in GTEFL's cost studies.

OBJECTION: GTEFL objects to this request on the grounds that planning documents contain proprietary and highly confidential competitive information. GTEFL further objects to this request on the grounds that planning information is irrelevant to selecting a cost model to determine the long run, forward-looking cost of unbundled network elements, and is not otherwise relevant to any issue in this proceeding.

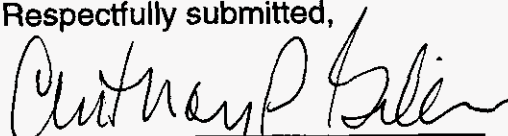
28. Please provide any and all workpapers and supporting documents underlying the salvage parameters proposed by GTEFL.

29. Please provide each and any document in your possession, custody, or control discussing, evaluating, or forecasting the migration of metallic plant to fiber plant for interoffice, feeder, and distribution plant.

OBJECTION: GTEFL objects to this request on the grounds that forecasting documents contain proprietary and highly confidential competitive information. GTEFL further objects to this request on the grounds that forecast information is irrelevant to selecting a cost model to determine the long run, forward-looking cost of unbundled network elements, and is not otherwise relevant to any issue in this proceeding.

30. Provide the Missouri Commission's Final Arbitration Order in Case No. TO-97-63, issued July 31, 1997, as referenced on pages 18 and 19 of Mr. Sovereign's testimony.
31. Please provide a copy of GTEFL s responses to interrogatories and requests for production of documents served by all other parties in this docket.

Respectfully submitted,



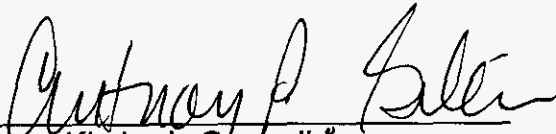
on Kimberly Caswell
GTE Service Corporation
One Tampa City Center
201 North Franklin Street (33602)
Post Office Box 110, FLTC0007
Tampa, Florida 33601-0110

Christopher Huther
Preston Gates Ellis & Rouvelas Meeds, LLP
1735 New York Avenue NW, Suite 500
Washington, DC 20006-5209

COUNSEL FOR GTE FLORIDA
INCORPORATED

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Objections to Staff's Fifth Request for Production of Documents and Fourth Set of Interrogatories in Docket No. 990649-TP were sent via overnight mail(*) on June 28, 2000 and U.S. mail on June 29, 2000 to the parties on the attached list.

on 

Kimberly Caswell *

Staff Counsel *
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Pennington Law Firm
Peter Dunbar
Karen M. Camechis
215 S. Monroe St., 2nd Floor
Tallahassee, FL 32301

AT&T
Marsha Rule
101 N. Monroe Street
Suite 700
Tallahassee, FL 32301-1549

BellSouth Telecommunications
Nancy B. White
c/o Nancy H. Sims
150 South Monroe St., Suite 400
Tallahassee, FL 32301-1556

Florida Cable Telecomm. Assoc
Michael A. Gross
310 N. Monroe Street
Tallahassee, FL 32301

Florida Public Tele. Assoc.
Angela Green
125 S. Gadsden St., #200
Tallahassee, FL 32301-1525

MCI WorldCom Inc.
Donna Canzano McNulty
325 John Knox Road, Suite 105
Tallahassee, FL 32303-4131

Jon C. Moyle, Jr.
Cathy M. Sellers
Moyle Flanigan et al.
The Perkins House
118 N. Gadsden Street
Tallahassee, FL 32301

Messer Law Firm
Floyd Self
215 S. Monroe St., Suite 701
Tallahassee, FL 32301

Time Warner Telecom
Carolyn Marek
233 Bramerton Court
Franklin, TN 37069

Joseph McGlothlin
McWhirter Reeves Law Firm
117 S. Gadsden Street
Tallahassee, FL 32301

Charles J. Beck
Office of Public Counsel
111 W. Madison Street
Room 812
Tallahassee, FL 32399-1400

Intermedia Comm. Inc.
Scott Sapperstein
3625 Queen Palm Drive
Tampa, FL 33619

Richard D. Melson
Gabriel E. Nieto
Hopping Law Firm
123 S. Calhoun Street
Tallahassee, FL 32314

Elise Kiely
Jeffrey Blumenfeld
Blumenfeld & Cohen
1625 Mass. Avenue, N.W.
Suite 300
Washington, DC 20036

Bruce May
Holland Law Firm
315 S. Calhoun Street
Suite 600
Tallahassee, FL 32301

Mark Buechele
Supra Telecommunications
Koger Center-Ellis Building
1311 Executive Center Drive
Suite 200
Tallahassee, FL 32301-5027

Charles Rehwinkel
Sprint-Florida
1313 Blairstone Road
MC FLTLHO0107
Tallahassee, FL 32301

Glenn Harris
NorthPoint Comm. Inc.
222 Sutter Street, 7th Floor
San Francisco, CA 94108

Catherine F. Boone
Covad Comm. Co.
10 Glenlake Parkway
Suite 650
Atlanta, GA 30328-3495

Gregory J. Darnell
MCI WorldCom Inc.
Six Concourse Parkway
Suite 3200
Atlanta, GA 30328

Eric J. Branfman
Morton J. Posner
Swidler Berlin Law Firm
3000 K Street NW, Suite 300
Washington, DC 20007-5116

John McLaughlin
KMC Telecom Inc.
Suite 170
3025 Breckenridge Blvd.
Duluth, GA 30096

Bettye Willis
Alltel Comm. Services Inc.
One Allied Drive
Little Rock, AR 72203-2177

J. Jeffry Wahlen
Ausley & McMullen
227 S. Calhoun Street
Tallahassee, FL 32302

ACI Corp.
7337 S. Revere Parkway
Englewood, CO 80112

Vicki Gordon Kaufman
McWhirter Reeves Law Firm
117 South Gadsden Street
Tallahassee, FL 32301

BlueStar Networks, Inc.
Norton Cutler
401 Church Street, 24th Floor
Nashville, TN 37201

BlueStar Networks, Inc.
Michael Bressman
401 Church Street, 24th Floor
Nashville, TN 37201

George S. Ford
Chief Economist
Z-Tel Communications Inc.
601 S. Harbour Island Blvd.
Tampa, FL 33602

Jonathan E. Canis
Michael B. Hazzard
Kelley Drye & Warren
1200 19th St. NW, 5th Floor
Washington, DC 20036

Rodney L. Joyce
Shook Hardy & Bacon LLP
600 14th St. N.W., Suite 800
Washington, DC 20005-2004

Russell M. Blau
Marc B. Rothschild
Swidler Berlin Law Firm
3000 K St. NW, Suite 300
Washington, DC 20007-5116

John Spilman
Broadslate Networks Inc.
675 Peter Jefferson Parkway
Suite 310
Charlottesville, VA 22911

Constance L. Kirkendall
@link Network, Inc.
2220 Campbell Creek Blvd.
Suite 110
Richardson, TX 75082-4420

Hope G. Colantonio
Cleartel Communications Inc.
1255 22nd Street NW, 6th Floor
Washington, DC 20037