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Kimberly Caswell Counsel

July 14, 2000

GTE SERVICE CORPORATION

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

Docket No. 990649-TP Re:

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 Motion to Compel Responses to GTE's First 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 Caswel

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Enclosures

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 990649-TP Filed: July 14, 2000

GTE FLORIDA INCORPORATED'S MOTION TO COMPEL RESPONSES TO GTE'S FIRST SET OF INTERROGATORIES

In accordance with Florida Rule of Civil Procedure 1.380, GTE Florida Incorporated (GTEFL) moves the Commission for an expedited order compelling AT&T Communications of the Southern States, Inc. (AT&T), KMC I, II, and III Telecom, Inc. (KMC), MCI WorldCom, Inc. (MCI), Covad Communications (Covad), and Z-Tel Communications, Inc. (Z-Tel), to respond to GTEFL's First Set of Interrogatories. GTEFL's interrogatories and document requests sought information concerning these companies' respective depreciation practices. All of these parties have notified GTEFL that they do not intend to answer any of GTEFL's discovery. Most have lodged objections that the information sought is not relevant to this proceeding.

These objections are unwarranted. All of GTEFL's document requests and interrogatories are, in fact, directly relevant to the issues in this case. In this proceeding, the Commission will establish depreciation inputs to be used in the models that will produce costs for unbundled network elements (UNEs). The models all calculate costs on a forward-looking basis, so model inputs, such as depreciation lives, must also be on a forward-looking basis. (See, e.g., Direct Testimony of AT&T witness Michael J. Majoros, June 8, 2000.) GTEFL believes the parties generally agree that depreciation lives should reflect "the actual life of the equipment." (See, e.g., Deposition of Carol Bentley, Supra, at 32; Direct Testimony of Michael J. Majoros, Jr. at 4.) In order to

determine such lives, the Commission must consider current telecommunications industry practices, as well as competitive and technological trends. The depreciation lives, salvage values, and depreciation rates used by other telecommunications companies thus provide very useful information for determining reasonable depreciation inputs for use in the ILECs' cost models in this proceeding.

For these reasons, GTEFL asks the Commission to grant this Motion to Compel and to immediately require the designated parties to respond to GTEFL's interrogatories.

Respectfully submitted on July 14, 2000.

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Attorney for GTE Florida Incorporated

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Motion to Compel Responses to GTE's First Set of Interrogatories in Docket No. 990649-TP were sent via facsimile(*) on July 13, 2000 and U.S. mail on July 14, 2000 to the parties on the attached list.

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