

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)

RECORDS AND
REPORTING

00 JUL 14 PM 2:30

RECEIVED-FPSC

July 14, 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:

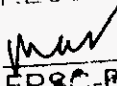
Please find enclosed for filing in the above matter an original and fifteen copies of GTE Florida Incorporated's Motion to Compel Responses to GTE's First Set of Interrogatories. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at (813) 483-2617.

Sincerely,


Kimberly Caswell

KC:tas
Enclosures

- APP _____
- CAF _____
- CMP 0/1/1a
- COM 3
- CTR _____
- ECR _____
- LEG 2
- OPC _____
- PAI _____
- RGD _____
- SEC 1
- SER _____
- OTH _____

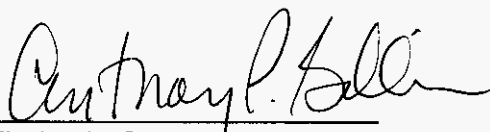
RECEIVED & FILED

FPSC-BUREAU OF RECORDS

30 JUL 14 2000
DOCUMENT NUMBER-DATE
08531 JUL 14 8
FPSC-RECORDS/REPORTING

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.

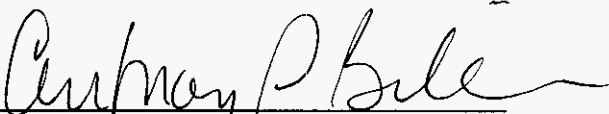
Respectfully submitted on July 14, 2000.

By: 
Kim Kimberly Caswell
P. O. Box 110, FLTC0007
Tampa, FL 33601
Telephone: (813) 483-2617

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.



per 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 *

Jim Lamoureux/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

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

Brent E. McMahan
VP-Reg./Govt. Affairs
Network Telephone Corp.
815 South Palafox Street
Pensacola, FL 32501

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

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

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

Marc B. Rothschild
Robert Ridings
Swidler Berlin Law Firm
3000 K Street NW, Suite 300
Washington, DC 20007-5116

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

Floyd R. Self
Messer Law Firm
215 S. Monroe Street
Suite 701
Tallahassee, FL 32302