

ORIGINAL



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August 10, 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 AT&T's First 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,

RECEIVED & FILED

Ernesto Mayor Jr. for
Kimberly Caswell

[Signature]
FPSC-BUREAU OF RECORDS

- ACK
- AFA 1
- APP
- CAF
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- EAG
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- LIN 5
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- RCH
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A part of GTE Corporation

DOCUMENT NUMBER-DATE

08475 AUG 10 88

FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the cost of providing)
basic local telecommunications service,)
pursuant to Section 364.025, Florida Statutes)
_____)

Docket No. 980696-TP

Filed: August 10, 1998

**GTE FLORIDA INCORPORATED'S OBJECTIONS TO
AT&T'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (1-16)**

GTE Florida Incorporated (GTEFL) files its preliminary objections to the First Request for Production of Documents served upon GTEFL by AT&T Communications of the Southern States, Inc. (AT&T). GTEFL reserves the right to make additional and/or more complete objections when it files its responses to AT&T's First Request for Production of Documents.

GENERAL OBJECTIONS

Each of the general objections set forth below is incorporated into each of the specific responses and objections.

1. GTEFL objects to AT&T's definition of "GTE" to the extent it includes GTEFL's "affiliates," "parents," "subsidiaries," "agents," "representatives," and all other entities that are not GTEFL. 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 AT&T's discovery only on behalf of GTEFL.
2. GTEFL objects to AT&T's discovery to the extent that it seeks information which is obtainable from some other source that is more convenient, less burdensome, or less expensive.
3. GTEFL objects to AT&T'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.

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FFSC-RECORDS/REPORTING

4. GTEFL's later responses to these document requests will be made subject to, qualified by, and made without waiver of each of the foregoing general objections.

SPECIFIC OBJECTIONS

- 1) Please provide all supporting workpapers that have been prepared or used by GTE or any of its divisions, subsidiaries, project teams, functional groups, consultants or employees related to your response to AT&T's Interrogatory No. AT&T I-2.

Objection to Production of Documents Request No. 1:

Please see GTE's objection to AT&T's Interrogatory No. 2.

- 3) Please provide copies of GTE's 1990-1997 ARMIS 43-07 reports for Florida.

Objection to Production of Documents Request No. 3:

GTEFL objects to this Request because it is unduly burdensome. Any ARMIS reports GTEFL has been required to file are publicly available and easily obtainable by AT&T. In addition, GTEFL objects to this Request to the extent that it seeks information prior to 1997. Such historical data is not relevant to choosing a cost proxy model to determine the forward-looking cost of providing basic service.

- 5) Produce all documents regarding policies, guidelines, practices and procedures for planning of the local loop network.

Objection to Production of Documents Request No. 5:

GTEFL objects to this Request because it seeks information that is confidential and proprietary to GTEFL. GTEFL objects, in addition, because this Request is unduly broad and burdensome. Notwithstanding this objection, GTEFL will produce relevant data at the appropriate time, upon AT&T's execution of the protective agreement.

- 6) Produce all documents regarding the selection and deployment of technology in the local loop network.

Objection to Production of Documents Request No. 6:

Please see GTE's objection to Production Request No. 5.

- 7) Produce all documents regarding the sizing of the elements of the local loop network to include: copper and fiber feeder and distribution cables, drops, conduit runs, feeder-distribution interfaces, digital loop carrier systems, network interface devices, etc.

Objection to Production of Documents Request No. 7:

Please see GTE's objection to Production Request No. 5.

- 15) In regards to outside plant placement costs for using contractors instead of ILEC labor, please provide a copy of the OSP General or Master Agreement (including the detailed list of work items by quantity price breaks for which prices are provided). Provide for comparison purposes five OSP contracts awarded after competitive bidding that include pole placements, buried drops, buried cable trenching and plowing and manhole and conduit placement.

Objection to Production of Documents Request No. 15:

GTEFL objects to this request because it seeks confidential and highly restricted information, some of which is information proprietary to third party vendors. AT&T itself routinely objects to providing any price or other information from vendors because of the negative effects such disclosure could have on these third-party vendors' relationships with their customers. By the same token, GTEFL cannot be expected to turn over such sensitive data to AT&T. Notwithstanding these objections, GTEFL will produce a generic version of the Master Agreement.


- 16) Provide all documentation relating to policy or practice regarding the planning and deployment of two-channel Digital Subscriber Line systems.

Objection to Production of Documents Request No. 16:

GTEFL objects to this request because it does not seek any relevant information, nor is it calculated to lead to the discovery of any relevant and otherwise admissible information. Broadband-type services, such as Digital Subscriber Line systems, have nothing to do with this inquiry intended to determine the cost of providing basic local service.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Objections to AT&T's First Request for Production of Documents in Docket No. 980696-TP were sent via U.S. mail on August 10, 1998 to the parties on the attached list.


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