



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 Second 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,

- ACK
- AFA 1
- APP _____
- CAF _____
- CMU 1
- CTR _____
- EAG _____
- LEG 2
- LIN 5
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

Ernesto Mayor Jr.
Kimberly Caswell

RECEIVED & FILED
[Signature]
FPSC-BUREAU OF RECORDS

A part of GTE Corporation

DOCUMENT NUMBER-DATE

06476 AUG 10 98

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 SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (17-21)**

GTE Florida Incorporated (GTEFL) files its preliminary objections to the Second 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 Second 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.

DOCUMENT NUMBER-DATE

08476 AUG 10 88

FPSC-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

- 17) Please provide all documents and any other supporting data related to your response to AT&T's Interrogatory No. 47.

Objection to Production of Documents Request No. 17:

Please refer to GTEFL's objection to AT&T's Interrogatory No. 47.

- 18) Please provide all documents and other supporting data related to the ICM modeling assumption that all copper feeder cable in the 16-grid area around the wire center is underground conduit.

Objection to Production of Documents Request No. 18:

GTEFL objects to this Request because it does not seek any information relevant to this proceeding, nor is it calculated to lead to the discovery of any relevant and otherwise admissible information. GTEFL has not filed ICM in this docket. Therefore, there is no reason for AT&T to ask questions about it.

- 20) Please provide all documents (including work papers, drafts, notes, e-mail, minutes of meetings and supplier, vendor or contractor quotes) used to derive and support the following ICM Outside Plan User Options in this docket:

- a) Engineering Factor for Feeder
- b) Engineering Factor of Distribution
- c) Engineering Administration Fill
- d) Drop Wire Pairs
- e) Air to Route Mileage Ratio
- f) X Connect Box Factor
- g) Percent Hand Dig Factor
- h) Percent Concrete Factor
- i) User Defined Fill Factor for Distribution

- increasing amount of out-of-sight plant (buried or underground) cable placements
- p) the ILEC and power company should share equally in the cost of a joint use pole
 - q) the minimum number of lots per grid is 25
 - r) if (NumOfSegs >0.0); then nodes:=21

Objection to Production of Documents Request No. 21:

GTEFL objects to this Request because it does not seek any information relevant to this proceeding, nor is it calculated to lead to the discovery of any relevant and otherwise admissible information. GTEFL has not filed ICM in this docket. Therefore, there is no reason for AT&T to ask questions about it.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Objections to AT&T's Second 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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