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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

September 11, 1998

Re: Docket No. 980733-TL
Discovery for Study on Fair & Reasonable Rates and on Relationships
Among Costs and Charges Associated with Certain Telecommunications
Services Provided by LECs, as Required by Chapter 98-277

Dear Ms. Bayo:

Please find enclosed an original and fifteen copies of GTE Florida Incorporated's
Objections to the Attorney General's Fifth Request for Production of Documents for
filing 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.

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

Sincerely,
Kimberly Caswell
Kimberly Caswell

RECEIVED & FILED
[Signature]
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
09959 SEP 11 88
FPSC-RECORDS/REPORTING

A part of GTE Corporation

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Discovery and related study on fair)	Docket No. 980733-TL
and reasonable rates and on relationships)	Filed: September 11, 1998
among costs and charges associated)	
with certain telecommunications services)	
provided by local exchange companies)	
(LECs), as required by Chapter 98-277,)	
Laws of Florida)	
_____)	

**GTE FLORIDA INCORPORATED'S OBJECTIONS TO
THE ATTORNEY GENERAL'S FIFTH REQUEST
FOR PRODUCTION OF DOCUMENTS**

GTE Florida Incorporated (GTEFL) files its preliminary objections to the Fifth Request for Production of Documents served upon GTEFL by the Florida Attorney General (AG). GTEFL reserves the right to make additional and/or more complete objections when it files its responses to the AG's Fifth Request for Production of Documents. Each of the general objections set forth below is hereby incorporated into each of GTEFL's specific responses and objections to be filed later.

1. GTEFL objects to the AG's definition of GTE, "you", and "your" to the extent these terms could be construed to include GTEFL's affiliates, parents, subsidiaries, agents, representatives, and all other entities that are not GTEFL. Only GTEFL's costs and associated information are relevant to this proceeding to determine a fair and reasonable rate for basic, local residential telecommunications service. GTEFL will thus respond to the AG's discovery only on behalf of GTEFL.

2. GTEFL objects to the AG'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.

DOCUMENT NUMBER-DATE

09959 SEP 11 88

FPSC-RECORDS/REPORTING

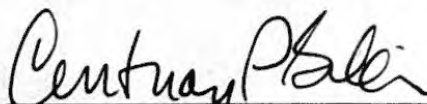
GTE Florida's Objections to
AG's 5th Set of Production
of Documents
Page 2

3. GTEFL objects to the AG'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.

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.

Respectfully submitted on September 11, 1998.

By:



Kim

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Attorney for GTE Florida Incorporated

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Objections to the Attorney General's Fifth Request for Production of Documents in Docket No. 980733-TL were sent via overnight mail on September 10, 1998(*) and U.S. mail on September 11, 1998 to the parties on the attached list.

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bcw

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