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May 31, 2000

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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

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 Opposition to AT&T's Motion for Continuance of Hearing. 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

A part of GTE Corporation

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing) Docket No. 990649-TP
of unbundled network elements) Filed: May 31, 2000
_____)

**GTE FLORIDA INCORPORATED'S OPPOSITION TO
AT&T'S MOTION FOR CONTINUANCE OF HEARING**

GTE Florida Incorporated (GTE) opposes the Motion for Continuance of Hearing (Motion) filed by AT&T Communications of the Southern States, Inc. (AT&T) on May 25, 2000.

In its Motion, AT&T alleges that it has not yet been able to properly review BellSouth's cost model submitted in this proceeding. For this reason, AT&T seeks a continuance of the entire hearing.

The claimed problems with BellSouth's cost model were the reason for an earlier motion, filed by AT&T and other alternative local exchange carriers (ALECs), requesting an extension of time to file their testimony. GTE opposed that earlier motion for the same reasons it opposes the instant Motion. Once again, the relief sought would necessarily affect GTE, but the claimed reason for the requested relief—difficulties with BellSouth's model--has nothing to do with GTE.

GTE has already been prejudiced by the ALECs' efforts to accommodate their efforts to review BellSouth's model. Although the Commission has not yet ruled on the ALECs' earlier motion to extend their testimony date, the ALECs have already gotten a *de facto* extension. They will not file testimony on June 1, which is the existing testimony date. This means that, whatever the disposition of their motion for extension, they have already gained an advantage by being able to file their *direct*, as well as their

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rebuttal, case at some later date. They have gotten this *de facto* relief despite the fact that there is no reason for them to file their direct testimony late. Their direct case does not rest on their ability to review BellSouth's model; such review is important only for their rebuttal testimony.

Granting AT&T's Motion for Continuance will only expand the advantage the ALECs have already gained in filing their testimony late. Continuing the hearing will give them that much more time to review GTE's model and to conduct discovery on GTE. At the same time, GTE's time to review the ALECs' cost models and engage in discovery has been curtailed because they have been excused from filing their direct case on time.

The inequity of this result is compounded by the fact that GTE has done nothing to cause the difficulties AT&T and other ALECs have cited as the basis for the motions to extend the testimony dates and to continue the hearing.

For these reasons, GTE opposes AT&T's Motion and asks the Commission to deny it. If the Commission is considering granting AT&T's Motion and/or the ALECs' motion to extend their testimony deadline (even further), then GTE asks the Commission to fashion relief that does not prejudice GTE any more than it already has been. In particular, the ALECs should be ordered to file their direct case immediately and GTE must be permitted as much time for rebuttal to the ALECs' direct case as the ALECs' have had for rebuttal to GTE's direct case. Accommodation of these concerns is the only way the Commission can grant any relief consistent with procedural and substantive due process requirements.

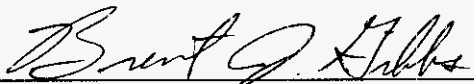
Respectfully submitted on May 31, 2000.

By: 
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Opposition to AT&T's Motion for Continuance of Hearing in Docket No. 990649-TP were sent via electronic mail on May 30, 2000 and/or U.S. mail on May 31, 2000 to the parties on the attached list.



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