

ORIGINAL



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RECORDS AND
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May 30, 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 Objections to Rhythms Links, Inc.'s First Request for Production of Documents. Also enclosed are an original and fifteen copies of GTE Florida Incorporated's Objections to Rhythms Links, Inc.'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 3 _____
- COM 5 _____
- CTR _____
- EGR 3 _____
- LEG 2 _____
- OPC _____
- PAI 1 _____
- RGO _____
- SEC 1 _____
- SER _____
- OTH _____

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RECORDS AND REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Investigation into pricing of
unbundled network elements

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Docket No. 990649-TP
Filed: May 30, 2000

**GTE FLORIDA INCORPORATED'S
OBJECTIONS TO RHYTHMS LINKS, INC.'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

GTE Florida Incorporated ("GTEFL"), by counsel and pursuant to the procedural order in this docket (Order No. PSC-00-0540-PCO-TP), hereby files its initial objections to Rhythms Links, Inc.'s ("Rhythms") First Request for Production of Documents. GTEFL reserves the right to make additional and/or more complete objections when it files its responses to Rhythms' First Request for Production of Documents.

GENERAL OBJECTIONS

GTEFL generally objects to Rhythms' First Request for Production of Documents as follows:

1. GTEFL objects to Rhythms' definition of "GTE" to the extent it includes "affiliates," "parents," "subsidiaries," "agents," "representatives," and all other entities that are not GTEFL. The purpose of this proceeding is to establish rates for unbundled network elements based on long run forward-looking costs. Only GTEFL's costs and associated information are relevant to this purpose. GTEFL will thus respond to Rhythms' discovery only on its own behalf.
2. GTEFL objects to Rhythms' First Request for Production of Documents to the extent they seek 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

DOCUMENT NUMBER-DATE

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FPCO-RECORDS/REPORTING

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.

3. GTEFL objects to Rhythms' First Request for Production of Documents to the extent they seek production of documents or disclosure of information not relevant to the subject matter of this action and not reasonably calculated to lead the discovery of admissible evidence.

4. GTEFL objects to Rhythms' First Request for Production of Documents to the extent they are unduly burdensome, vague, ambiguous, overbroad, annoying, harassing or fail to specify clearly the documents requested. Moreover, GTEFL objects to these requests to the extent that they seek information that is obtainable from some other source that is more convenient, less burdensome, or less expensive.

5. GTEFL objects to Rhythms' First Request for Production of Documents to the extent they purport to impose on GTEFL greater obligations than those imposed by the Florida Rules of Civil Procedure.

6. GTEFL objects to Rhythms' First Request for Production of Documents to the extent they require GTEFL to concede the relevance, materiality, or admissibility of the documents sought by each request, as GTEFL reserves its right to raise all such objections in this or any other action.

7. GTEFL's later responses to Rhythms' First Request for Production of Documents will be made subject to, qualified by, and without waiver of each of the foregoing General Objections and the following Specific Objections.

DOCUMENT REQUESTS

GTEFL specifically objects to Rhythms' First Request for Production of Documents as follows:

General

1. Please provide copies of any documents that have been provided to any other party in this proceeding pursuant to any Request for Production of Documents.

DSL Qualification

2. Please provide all associated workpapers, backup material, source or other data supporting GTE's proposed charge for loop qualification. To the extent that GTE believes that its cost study inputs or assumptions are supported by factual data (e.g., such as time and motion studies, invoices that identify the price that GTE has recently paid for materials, etc.) please insure that a copy of that material is provided and is properly cross-referenced to the portion of the study that it supports. Please provide material in both electronic and paper formats.
3. Please provide a complete copy of any analysis performed by GTE or on GTE's behalf within the last 2 years that analyzes GTE's ability to perform loop qualification for Digital Subscriber Line ("DSL") services on a fully or partially mechanized manner.
4. Please provide a copy of all studies or other documentation identified in response to Interrogatory No. 5.

OBJECTION:

Please see GTEFL's objection to Rhythms' Interrogatory No. 5.

5. Please provide a copy of all studies or other documentation identified in response to Interrogatory No. 6.

OBJECTION:

Please see GTEFL's objection to Rhythms' Interrogatory No. 6.

6. Please provide a complete copy of all internal documentation related to plans to mechanize any portion of GTE's systems and processes to qualify loops for ADSL service(s).

OBJECTION:

GTEFL objects to this Request on the grounds that it is overbroad and unduly burdensome to the extent that it seeks information that is proprietary and highly confidential.

7. Please provide a copy of all studies or other documentation identified in response to Interrogatory No. 9.
8. Please provide a copy of all studies or other documentation identified in response to Interrogatory No. 11.

OBJECTION:

Please see GTEFL's objection to Rhythms' Interrogatory No. 11.

Loop Conditioning

9. Please provide a copy of all studies or other documentation identified in response to Interrogatory No. 20.
10. Please provide a copy of all studies or other documentation identified in response to Interrogatory No. 21.
11. Please provide all associated workpapers, backup material, source or other data supporting GTE's proposed charges for loop conditioning. To the extent that GTE believes that its cost study inputs or assumptions are supported by factual data (e.g., such as time and motion studies, invoices that identify the price that GTE has recently paid for materials, etc.) please insure that a copy of that material is provided and is properly cross-referenced to the portion of the study that it supports. Please provide material in both electronic and paper formats.
12. Please provide all associated workpapers, backup material, source or other data supporting the labor time estimates used in GTE's nonrecurring costs calculations for loop conditioning. To the extent that GTE believes that its cost study inputs or assumptions are supported by factual data (e.g., such as time and motion studies, etc.) please insure that a copy of that material is provided and is properly cross-referenced to the portion of the study that it supports. Please provide material in both electronic and paper formats.
13. Please provide a copy of all studies or other documentation identified in response to Interrogatory No. 22.
14. Please provide a copy of all studies or other documentation identified in response to Interrogatory No. 23.
15. Please provide a copy of all studies or other documentation identified in response to Interrogatory No. 24.

16. If not supplied in response to a previous request, please provide a complete copy of the engineering methods and procedures that GTE would rely on to engineer and install new outside plant loop facilities.

17. Please provide a copy of all studies or other documentation identified in response to Interrogatory No. 26.

OBJECTION:

Please see GTEFL's objection to Rhythms' Interrogatory No. 26.

18. Please provide a copy of all studies or other documentation identified in response to Interrogatory No. 28.

OBJECTION:

Please see GTEFL's objection to Rhythms' Interrogatory No. 28.

19. Please provide a copy of all studies or other documentation identified in response to Interrogatory No. 33.

OBJECTION:

Please see GTEFL's objection to Rhythms' Interrogatory No. 33.

20. Please provide a copy of all studies or other documentation identified in response to Interrogatory No. 34.

OBJECTION:

Please see GTEFL's objection to Rhythms' Interrogatory No. 34.

21. If not provided in response to a previous request, please supply a copy of GTE's engineering methods and procedures relative to conditioning work required to provide retail ISDN service.

OBJECTION:

GTEFL objects to this Request on the grounds that it is overbroad, unduly burdensome, and seeks information that is proprietary, and not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services.

22. If not provided in response to a previous request, please supply a copy of GTE's engineering methods and procedures relative to conditioning work required to provide retail ADSL service.

OBJECTION:

GTEFL objects to this Request on the grounds that it is overbroad, unduly burdensome, and seeks information that is proprietary, and not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services.

23. Please provide a copy of all studies or other documentation identified in response to Interrogatory No. 38.
24. Please provide a copy of all studies or other documentation identified in response to Interrogatory No. 39.
25. Please provide a copy of all studies or other documentation identified in response to Interrogatory No. 40.

OBJECTION:

Please see GTEFL's objection to Rhythms' Interrogatory No. 40.

Retail Cost Analysis

26. Please provide a copy of all studies or other documentation identified in response to Interrogatory No. 48.

OBJECTION:

Please see GTEFL's objection to Rhythms' Interrogatory No. 48.

27. Please provide a copy of the most recent documentation detailing any planned changes to GTE's telecommunication plant that relate to the demand for retail DSL. Provide all related documentation including but not limited to GTE's planned methodology to provide DSL services to customers with relatively long loops or with loops that are provided over fiber feeder and DLC systems, relative to copper loops that require "conditioning," *etc.* If a GTE-specific planning document did not exist, please provide whatever planning document would covers GTE's service area (even if that documentation is not final or "approved").

OBJECTION:

GTEFL objects to this Request on the grounds that it is overbroad, unduly burdensome, and seeks information that is proprietary, highly confidential and not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services.

DLC Issues

28. Please provide a copy of all studies or other documentation identified in response to Interrogatory No. 54.

OBJECTION:

Please see GTEFL's objection to Rhythms' Interrogatory No. 54.

29. Please provide a copy of all studies or other documentation identified in response to Interrogatory No. 58.

OBJECTION:

Please see GTEFL's objection to Rhythms' Interrogatory No. 58.

30. Please provide a copy of all studies or other documentation identified in response to Interrogatory No. 61.

31. Please provide a copy of all studies or other documentation identified in response to Interrogatory No. 65.

OBJECTION:

Please see GTEFL's objection to Rhythms' Interrogatory No. 65.

32. Please provide a copy of all studies or other documentation identified in response to Interrogatory No. 66.

OBJECTION:

Please see GTEFL's objection to Rhythms' Interrogatory No. 66.

33. Please provide a copy of all studies or other documentation identified in response to Interrogatory No. 68.

OBJECTION:

Please see GTEFL's objection to Rhythms' Interrogatory No. 68.

34. Please provide a copy of all studies or other documentation identified in response to Interrogatory No. 71.

OBJECTION:

Please see GTEFL's objection to Rhythms' Interrogatory No. 71.

35. Please provide a copy of all studies or other documentation identified in response to Interrogatory No. 75.

OBJECTION:

Please see GTEFL's objection to Rhythms' Interrogatory No. 75.

SMEs


36. Please produce resumes, curriculum vitae or related documents for each individual who supplied information referencing, regarding or relating to task descriptions and task times GTE contends are associated with designing, provisioning, maintaining or repairing each and every type of xDSL loop referenced in GTE's cost studies.

OBJECTION:

GTEFL objects on the grounds that this request is overbroad and unduly burdensome.

37. Please provide a copy of all studies or other documentation identified in response to Interrogatory No. 84.

Respectfully submitted,



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Washington, DC 20006-5209

COUNSEL FOR GTE FLORIDA
INCORPORATED

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of unbundled network elements)
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_____)

Docket No. 990649-TP
Filed: May 30, 2000

**GTE FLORIDA INCORPORATED'S
OBJECTIONS TO RHYTHMS LINKS, INC.'S
FIRST SET OF INTERROGATORIES**

GTE Florida Incorporated ("GTEFL"), by counsel and pursuant to the procedural order in this case (Order No. PSC-00-0540-PCO-TP), hereby files its initial objections to Rhythms Links, Inc.'s ("Rhythms") First Set of Interrogatories. GTEFL reserves the right to make additional and/or more complete objections when it files its responses to Rhythms' First Set of Interrogatories.

GENERAL OBJECTIONS

GTEFL generally objects to Rhythms' First Set of Interrogatories as follows:

1. GTEFL objects to Rhythms' definition of "GTE" to the extent it includes "affiliates," "parents," "subsidiaries," "agents," "representatives," and all other entities that are not GTEFL. The purpose of this proceeding is to establish rates for unbundled network elements based on long run forward-looking costs. Only GTEFL's costs and associated information are relevant to this purpose. GTEFL will thus respond to Rhythms' discovery only on its own behalf.
2. GTEFL objects to Rhythms' First Set of Interrogatories 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.

3. GTEFL objects to Rhythms' First Set of Interrogatories to the extent it seeks information not relevant to the subject matter of this action and not reasonably calculated to lead to the discovery of admissible evidence.

4. GTEFL objects to Rhythms' First Set of Interrogatories to the extent it is unduly burdensome, vague, ambiguous, over broad, annoying, harassing or fails to specify clearly the information requested. Moreover, GTEFL objects to Rhythms' First Set of Interrogatories to the extent that it seeks information that is obtainable from some other source that is more convenient, less burdensome, or less expensive.

5. GTEFL objects to Rhythms' First Set of Interrogatories to the extent it purports to impose on GTEFL's greater obligations than those imposed by the Florida Rules of Civil Procedure.

6. GTEFL objects to Rhythms' First Set of Interrogatories to the extent it requires GTEFL to concede the relevance, materiality, or admissibility of the documents sought by each request, as GTEFL reserves its right to raise all such objections in this or any other action.

7. GTEFL's later responses to Rhythms' First Set of Interrogatories will be made subject to, qualified by, and without waiver of each of the foregoing General Objections and the following Specific Objections.

INTERROGATORIES

GTEFL specifically objects to Rhythms' First Set of Interrogatories as follows:

General

1. Please provide copies of all press releases in which GTE discussed GTE/Bell Atlantic merger savings.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome and seeks information not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not to review the pending GTE/Bell Atlantic merger.

2. Please provide copies of any material detailing GTE/Bell Atlantic merger savings that GTE has provided to Florida regulators.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome and seeks information not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not to review the pending GTE/Bell Atlantic merger.

3. Does GTE believe its recurring and nonrecurring studies assume the same network design? If not, please explain in detail how the assumptions can be adjusted by a model user to produce a cost study that meets this criterion.
4. For loops assumed to be served by copper feeder (with no DLC) please provide a detailed explanation of every assumption in GTE's cost studies that causes a difference in the cost result for a basic/analog loop as compared with a DSL-capable loop.

DSL Qualification

5. Please provide a detailed description of the most recently planned process that GTE intends or intended to use to determine if specific customers/customer locations qualify for its retail ADSL service. Please identify all documentation GTE has developed for internal use that describes the current and planned future state of that process.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is proprietary, highly confidential and not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services.

6. Please provide a detailed description of the process that any GTE affiliate plans to use to determine if specific customers/customer locations qualify for retail ADSL service. Please identify all documentation GTE's affiliate has developed for internal use that describes the current and planned future state of that process.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is proprietary, highly confidential and not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services or the practices of GTEFL's affiliates.

7. Please identify each activity that GTE believes it must perform to "qualify" an unbundled loop for DSL service that GTE believes a competitive carrier could not perform on its own behalf if it had access to the same loop plant records that GTE utilizes. Please explain GTE's basis for believing that a competitive carrier could not perform each step so identified on its own behalf.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome and calls for speculation. GTEFL does not have sufficient information to determine what activities a hypothetical competitive carrier is capable of performing on its own behalf.

8. For each item that GTE's Engineering personnel currently research to determine if an unbundled loop is DSL qualified on a competitive carrier's behalf (e.g., splice points, bridge taps, load coils, cable gauge, etc.) please indicate the name of any GTE electronic database that was designed to hold that data (e.g., "GTE reviews cable gauge information. LFACS is designed to include cable gauge information."). Please specify if any data that GTE believes is required to qualify an unbundled loop for DSL services is not designed to be included in any current GTE database/system (i.e., if the data is only found on paper records 100 percent of the time). If data resides both on mechanized systems and via paper records, please identify specifically what information resides on each and the extent to which the data, or portions thereof, is included in both.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that the phrase "DSL Qualified on a competitive carrier's behalf" is vague and ambiguous.

9. Assume that GTE is about to plan and construct all new outside plant facilities to serve a new business park and/or residential complex (creating new plant feeder and distribution routes from the ground up). Does GTE have methods and procedures that govern what records should be maintained regarding that new plant and how those records should be generated? If so, please identify all documentation relating to such methods and procedures.

10. Assume that GTE is about to plan and construct all new outside plant facilities to serve a new business park and/or residential complex (creating new plant feeder and distribution routes from the ground up). In that circumstance please identify which database(s) GTE would enter each of the following types of data into or indicate that the data would not be maintained in any electronic database or system.
 - The location of splice points
 - Cable gauges
 - Cable lengths
 - FDI locations and types
 - Electronics locations and types
 - Bridge tap location and design
 - Repeater location and type
 - Availability of spare pair
 - Identification of cables, binder groups, pairs
 - Presence and type of Digital Loop Carrier ("DLC")
 - Location serving area interfaces

11. Is GTE currently analyzing the possibility or does it have any plans to expand mechanization of its retail DSL ordering capabilities? If so, please identify all documentation relating to GTE's planning effort.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is proprietary, highly confidential and not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services.

12. For each GTE database/system that contains or was designed to contain information that GTE believe is relevant to the qualification of unbundled loops for DSL service, please indicate if it is possible to provide remote read-only access to that database.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that the phrase "information that GTE believe is relevant to the qualification of unbundled loops for DSL service" is vague and ambiguous.

13. For each GTE database/system that contains or was designed to contain information that GTE believe is relevant to the qualification of unbundled loops for DSL service, please indicate if GTE's field personnel have any means to obtain remote access to that data source.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that the phrase "information that GTE believe is relevant to the qualification of unbundled loops for DSL service" is vague and ambiguous.

14. Please provide a detailed description of generally how and in what specific accounts GTE records costs associated with maintaining its current databases and OSS. Please provide the total dollars reported for GTE's regulated state operations in each such account for each of the last 5 years.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements based on long run, forward-looking cost. OSS costs associated with the provisioning of unbundled network elements will be addressed in the next phase of this proceeding. Moreover, the Interrogatory seeks information prior to 1998. Such historical information is irrelevant to this proceeding.

15. Please provide a detailed description of how costs associated with maintaining its current databases and OSS are treated in GTE's study of the recurring cost of retail exchange service. Please insure that, at a minimum, GTE's reply identifies the specific source of the cost input data used in its study, and includes a discussion of any adjustment made to that input data and a detailed description regarding how those costs are assigned to exchange services.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is proprietary, highly confidential and not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services. OSS costs associated with the provisioning of unbundled network elements will be addressed in the next phase of this proceeding. GTEFL further

objects to the Interrogatory on the grounds that the term "GTE's study" is vague and ambiguous.

16. Please provide a detailed description of generally how and in what specific accounts GTE records costs associated with maintaining the accuracy of records in its current databases and OSS. Please provide the total dollars reported for GTE's regulated state operations in each such account for each of the last 5 years.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements based on long run, forward-looking cost. OSS costs associated with the provisioning of unbundled network elements will be addressed in the next phase of this proceeding. Moreover, the Interrogatory seeks information prior to 1998. Such historical information is irrelevant to this proceeding.

17. Please provide a detailed description of how costs associated with maintaining the accuracy of records in GTE's current databases and OSS are treated in its study of the recurring cost of retail exchange service. Please insure that, at a minimum, GTE's reply identifies the specific source of the cost input data used in its study, and includes a discussion of any adjustment made to that input data and a detailed description regarding how those costs are assigned to retail exchange services.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail exchange service. OSS costs associated with the provisioning of unbundled network elements will be addressed in the next phase of this proceeding. GTEFL further objects to the Interrogatory on the grounds that the term "its study" is vague and ambiguous.

18. Please provide a detailed description of generally how and in what specific accounts GTE records costs associated with expanding/improving/updating its current databases and OSS. Please provide the total dollars reported for GTE's regulated state operations in each such account for each of the last 5 years.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements based on long run, forward-looking cost, not address matters pertaining to

expanding/improving/updating OSS. OSS costs associated with the provisioning of unbundled network elements will be addressed in the next phase of this proceeding. Moreover, the Interrogatory seeks information prior to 1998. Such historical information is irrelevant to this proceeding.

19. Please provide a detailed description of how costs associated with expanding/improving/updating GTE's current databases and OSS are treated in its study of the recurring cost of retail exchange service. Please insure that, at a minimum, GTE's reply identifies the specific source of the cost input data used in its study, and includes a discussion of any adjustment made to that input data and a detailed description regarding how those costs are assigned to retail exchange services.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements based on long run, forward-looking cost, not address matters pertaining to the provisioning of retail exchange service or expanding/improving/updating OSS . OSS costs associated with the provisioning of unbundled network elements will be addressed in the next phase of this proceeding. GTEFL further objects to the Interrogatory on the grounds that the term "its study" is vague and ambiguous.

Loop Conditioning

20. Please provide GTE's basis for the assumption regarding the average number of bridged tap removals per loop conditioning request (GTE NRC Study, page 4-FL 6). Please identify any studies or other documentation supporting these assumptions.
21. Please provide the basis for the "Probability of Occurrence" statistics presented for bridged tap removal and load coil removal. (GTE NRC Study, pages 4-FL 50-51) Please identify all underlying workpapers and supporting documentation.
22. Please identify all documentation of the current engineering methods and procedures or other guidelines that include GTE's policies and practices relative to the placement of load coils, bridge tap, and/or repeaters in its new outside plant. "New outside plant" means feeder and/or distribution facilities engineered from the ground up to serve new demand. In GTE's answer, please identify the specific pages and/or sections of each document identified that GTE believes relate specifically to its deployment of load coils, bridge tap, and/or repeaters.
23. Please identify all documentation of the current engineering methods and procedures or other guidelines that include GTE's policies and practices relative to load coils, bridge tap, and/or repeaters when it augments existing outside plant. In GTE's answer, please identify the specific pages and/or sections of each document

identified that GTE believes relate specifically to its treatment of load coils, bridge tap, and/or repeaters when plant is augmented.

24. Please identify all documentation of the current engineering methods and procedures or other guidelines that include GTE's policies and practices relative to load coils, bridge tap, and/or repeaters when it is upgrading or modernizing existing outside plant. In GTE's answer, please identify the specific pages and/or sections of each document identified that GTE believes relate specifically to its treatment of load coils, bridge tap, and/or repeaters when plant is upgraded or modernized.
25. Please describe each type of line conditioning (e.g., removing load coils or bridge tap, adding or removing repeaters, rearranging outside plant facilities) that GTE will undertake (in any circumstance) in order to satisfy a request for its retail ADSL service or for a retail ADSL service provided by an GTE affiliate. If GTE claims that it will only condition lines in order to provide its service in limited cases, please provide a complete description of each such limitation.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services or the practices of GTEFL's affiliates.

26. Please describe GTE's methods and procedures for assessing conditioning charges on an GTE end user of retail ADSL service and identify all documentation relating to such methods and procedures.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services.

27. Please describe each type of line conditioning (e.g., removing load coils or bridge tap, adding or removing repeaters, rearranging outside plant facilities) that GTE will undertake (in any circumstance) in order to satisfy a request for its retail ISDN service. If GTE claims that it will only condition lines in order to provide its own retail ISDN service in limited cases, please provide a complete description of each such limitation.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services.

28. Please describe GTE's methods and procedures for assessing conditioning charges on an GTE end user of retail ISDN service and identify all documentation relating to such methods and procedures.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services.

29. For each type of line conditioning (e.g., rearranging outside plant facilities) that GTE might choose to perform in order to satisfy a request for its retail ADSL service or to provide a qualified line to an GTE affiliate, please describe specifically how GTE plans to recover any cost associated with that activity. Please also provide a citation to any language in GTE's retail tariff(s) that supports its proposed method of cost recovery.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services or the practices of GTEFL's affiliates.

30. Please provide a detailed description of how operating expenses associated with outside plant rearrangements are reflected in GTE's books. In responding to this request, please use the widest possible definition of "rearrangement" (i.e., include activities such as pair swaps due to repair calls, maintenance grooming of facilities, pair swaps triggered by service order activity, larger scale rearrangement to rehome facilities for new fiber placement, etc.). If GTE accounts for the costs associated with different types of rearrangement differently, please provide a complete answer for each different scenario.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad and unduly burdensome.

31. For each category of cost that GTE identified in response to the previous request, please provide a detailed description of how that category of costs is considered in the study that developed GTE's most recently adopted cost for an retail basic exchange service.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail basic exchange service.

32. Is it GTE's belief that both recurring and non-recurring costs should be calculated assuming the same network design? If "no," please explain GTE's position on this issue.
33. Has GTE done any analysis to establish that the combined cost study results for recurring and non-recurring costs for all loop types it provides represents a least-cost, most efficient plant design? If so, please identify that analysis.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is vague and ambiguous.

34. Has GTE done any analysis of the feasibility of "conditioning" multiple spare pairs to provide xDSL-type services to communities/customers who are currently served by long copper loops? If so, please identify such analysis and describe the use to which such analysis was put, what conclusions were reached and where such analysis was used to support either in whole or in part the cost study relied upon by GTE.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is proprietary, highly confidential and not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services.

35. Please describe each type of outside plant work activity that GTE has preformed in order to supply retail ISDN-BRI (e.g., need to swap out bad pair, service grooming, need to move ISDN capable pair to provide service, etc).

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services. GTEFL further objects to this request on the grounds that the phrase "that GTE has preformed" is vague and ambiguous.

36. Please provide a detailed description of how costs for each of the types of activity identified in response to the previous request are incorporated in GTE's loop cost study.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services.

37. Is it GTE's belief that it is not practical to "condition" multiple spare pairs either in advance or at one time to provide xDSL-type services to communities/customers who are currently served by long copper loops? If GTE contends that such practices are not practical, please provide a complete description of GTE's basis for that belief.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is proprietary, highly confidential and not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services.

38. When GTE places new fiber in an existing feeder route does it always (or typically) remove any copper facilities on that route? Please explain GTE's answer and identify any GTE guidelines that describe that practice. If GTE does not remove the existing copper, what subsequent use does GTE typically make of the original copper feeder facilities?

39. When GTE builds new outside plant loop facilities today do GTE's engineering guidelines recommend designing plant that will support only voice grade service or does GTE design its facilities to support digital services as well? Please identify any GTE engineering guidelines that support GTE's answer to this request.

40. Please identify what engineering guidelines GTE relies on to set the maximum and/or target limits for bridge tap on new loop plant that it may use to provide digital retail services (e.g., ISDN).

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services.

41. Does GTE agree that general industry guidelines suggest limits to total bridge tap for loop plant that will provide digital services? In GTE's opinion, what is industry guideline for bridge tap for the mix of products GTE plans to deploy in the future?

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is proprietary, highly confidential and not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services.

42. Please provide a complete description of how GTE's recurring retail exchange service cost study considers GTE's forward-looking deployment of bridge tap. Specifically, what costs associated with bridge tap are included in GTE's study, how were those costs derived and specifically where in the study do they appear?

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is proprietary, highly confidential and not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services. GTEFL further objects to the Interrogatory on the grounds that the term "GTE's recurring retail exchange service cost study" is vague and ambiguous.

43. Please verify that GTE's study of retail exchange service costs does not include the cost for load coils as an input. If GTE claims that load coil costs are included, please identify specifically how those costs were included in the GTE study, how the specific cost included was derived and specifically where in the study that cost appears.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is proprietary, highly confidential and not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail

services. GTEFL further objects to the Interrogatory on the grounds that the term "GTE's study of retail exchange service costs" is vague and ambiguous.

44. Has GTE at any time employed the Carrier Serving Area ("CSA") design guidelines in designing its outside plant? If so, please identify the timeframe during which GTE employed CSA. Please also describe the scope of GTE's use of CSA guidelines (e.g., was it used for all plant deployment or only in specific situations?)

45. Does GTE agree that one stated objective of CSA is to minimize bridge tap?

OBJECTION:

GTEFL objects to the Interrogatory on the grounds that the term "stated objective of CSA" is vague and ambiguous.

46. Does GTE agree that, with the CSA design concept, the maximum allowable bridged-tap is 2.5 kft, with no single bridged-tap longer than 2.0 kft? If "no," please provide the basis for GTE's belief.

OBJECTION:

GTEFL objects to the Interrogatory on the grounds that it is vague and ambiguous.

47. Does GTE agree that, with the CSA design concept, all loops must be unloaded and should not consist of more than two gauges of cable? If "no," please provide the basis for GTE's belief.

OBJECTION:

GTEFL objects to the Interrogatory on the grounds that it is vague and ambiguous.

Retail Cost Analysis

48. Please identify each cost study GTE has developed (for submission to a regulatory agency or for internal business case analysis) to determine its cost to provide retail ADSL service. If such cost study is from another jurisdiction, please describe any differences in methodology or output and indicate reasons for such variance between the current GTE cost study and the cost study used in the alternate jurisdiction.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is proprietary, highly confidential and not relevant to this proceeding. This proceeding is intended to establish rates for

unbundled network elements, not address matters pertaining to the provision of retail services.

49. Does the retail ADSL cost study submitted with GTE's FCC tariff for that service include any cost for electronics or fiber facilities associated with feeder facilities? If GTE's answer is anything other than an unqualified "no," please provide the following:

- a) A detailed description of what costs were included for feeder fiber and of how those costs were calculated.
- b) A detailed description of what FDI or RT electronics costs were included and of how those costs were calculated.
- c) A detailed description of what central office line termination electronics costs were included and of how those costs were calculated.
- d) A detailed description of what Digital Loop Carrier ("DLC") electronics costs were included and of how those costs were calculated.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, vague and ambiguous, and seeks information that is proprietary, highly confidential and not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services.

50. Please identify the specific page(s) and line(s) that reflect investment and expense related to for each of the following items in GTE's cost study in support of its FCC ADSL service filing:

- a) Splitters
- b) Splitter racking
- c) Space for splitter racking
- d) Tie cables to or from splitters
- e) Tie cables to or from a DSLAM
- f) Jumper placement
- g) Jumper removal
- h) DSL-specific OSS investment
- i) Loop qualification for DSL
- j) Line conditioning
- k) The High Frequency Portion of the Loop
- l) Loop Installation
- m) Testing
- n) Service order processing
- o) Splitter installation engineering
- p) Splitter installation ordering requirements

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, vague and ambiguous, and seeks information that is proprietary, highly confidential and not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services.

51. Please provide a detailed description of the outside plant loop design that was assumed in of the retail ADSL cost study submitted with GTE's FCC tariff filing including an identification of the percentage of fiber feeder that was assumed, if any, and the specific electronics that were assumed to connect copper distribution to any fiber feeder facilities. Please specify also if any DLC was assumed to be integrated or universal.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, vague and ambiguous, and seeks information that is proprietary, highly confidential and not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services.

52. Does GTE's retail ADSL cost study submitted with GTE's FCC tariff filing include a cost estimate for the unbundled access necessary to provide the identical configuration(s) that GTE proposes to offer competitive carriers for line sharing? If "no," please explain why not. If "yes," please identify which cost or combination of costs study is equivalent to the configuration(s) that GTE assumed in its retail ADSL cost study.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, vague and ambiguous, and seeks information that is proprietary, highly confidential and not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services.

DLC issues

53. Please identify the specific manufacturer(s) and model(s) of each type of DLC equipment that GTE has placed in its network within the last 5 years.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad and unduly burdensome in that it seeks information prior to 1998. Such historical information is

irrelevant to this proceeding, which is intended to establish rates for unbundled network elements based on long run, forward-looking cost.

54. Please identify the specific manufacturer(s) and model(s) of DLC equipment that GTE currently plans to deploy in future additions/upgrades/changes to its network. Please also identify the methods and procedures or other documentation that GTE personnel follow in when selecting specific equipment for a project involving the deployment of DLC.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is proprietary, highly confidential and not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services.

55. For each type of DLC equipment mentioned in response to the previous request, please indicate if GTE believes that that equipment is currently capable (with appropriate electronics) of providing any form of DSL service. If "yes," please describe each type of DSL service that that equipment can currently deliver.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is proprietary, highly confidential and not relevant to this proceeding. Moreover, this Interrogatory seeks information unrelated to GTEFL's current cost filing before this Commission. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services.

56. For each type of DLC equipment mentioned in response to the previous request, please indicate if GTE believes that that equipment is currently being modified (or is in testing) to provide additional forms of DSL service. If "yes," please describe each type of DSL service that is under development.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is proprietary, highly confidential and not relevant to this proceeding. Moreover, this Interrogatory seeks information unrelated to GTEFL's current cost filing before this Commission. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services.

57. Has GTE investigated whether the manufacture(s) of its chosen DLC equipment plan to deliver electronics that will enable any (or any other) varieties of DSL service to be provisioned over their DLC systems? If "yes," please provide whatever data is available to GTE concerning the types of DSL its vendors plan to support and the projected timeline for that product enhancement.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, vague, ambiguous, and seeks information that is proprietary, highly confidential and not relevant to this proceeding. Moreover, this Interrogatory seeks information unrelated to GTEFL's current cost filing before this Commission. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services.

58. If GTE has obtained quotations from its vendors relative to prices for upgrading its existing DLC systems to support DSL services, please identify the documents constituting those quotations and any related description of the upgrade process and capacity.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is proprietary, highly confidential and not relevant to this proceeding. Moreover, this Interrogatory seeks information unrelated to GTEFL's current cost filing before this Commission. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services.

59. Please identify the overall percentage of loops in GTE's recurring cost study that are provisioned both with and without Digital Loop Carrier systems (i.e., electronics).
60. Please identify the overall percentage of loops in GTE's current network that are provisioned both with and without Digital Loop Carrier systems (i.e., electronics).
61. In GTE's study of loop costs what criteria does GTE use to determine when fiber and DLC feeder systems would be used instead of copper feeder? Please identify any workpapers or other documents that GTE relies on to support its analysis.
62. Please provide a detailed description of the overall plant design that is assumed in GTE's loop study for loops serviced by fiber feeder and DLC systems (e.g., describe the specific type of DLC (manufacturer and model) the study assumed, the sizing and design of associated fiber, any additional assumptions regarding materials and labor used to connect the DLC system to copper distribution, etc.)

63. For loops assumed to be served by a DLC system please provide a detailed explanation of every assumption in GTE's cost study that causes a difference in the cost result for a basic/analog loop as compared with a DSL-capable.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds it is vague and ambiguous.

64. Please describe the specific feeder electronics that GTE assumes for digital (ISDN-BRI) loops in its cost study for those loops that are served by a DLC system. Please insure that GTE's description includes the manufacturer, product name, capacity and any other significant features of the electronics.
65. Please provide a complete supporting detail for the specific input cost(s) used in GTE's loop study for the electronics described in the previous response. Please identify GTE's source contract, catalog or other similar document.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that the phrase "a complete supporting detail for the specific input cost(s)" is vague and ambiguous.

66. Please provide the most recent price that GTE actually paid for the specific electronics described in the previous response. Please identify GTE's source purchase order or other similar document.

OBJECTION:

Please see objection to Interrogatory No. 65.

67. For each type of line card/electronics that GTE has deployed within the last 10 years to provision ISDN services over fiber feeder facilities, please identify the average cost per line of ISDN-BRI service provisioned in each year (i.e., show the cost per line trend of the electronics that GTE uses to provide ISDN-BRI by showing the cost of that equipment on a per line basis in each of the last 10 years or as far back as data is available).

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad and unduly burdensome in that it seeks information prior to 1998. Such historical information is irrelevant to this proceeding, which is intended to establish rates for unbundled network elements based on long run, forward-looking cost, not address matters pertaining to the provision of retail services.

68. Has GTE developed a cost study that provides a specific cost result for the transport of DSL service related data over GTE's fiber feeder facilities? If "yes," please identify the specific study containing that result and any supporting discussion. If "no," please explain why GTE has not provided a cost study to support that capability.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is proprietary, highly confidential and not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services.

69. Is it GTE's position that it is technically infeasible to transport DSL service related data over digital loop carrier ("DLC") and fiber feeder facilities to end users? If "yes," please provide a detailed description of the basis for GTE's position.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services.

70. Does GTE believe that all retail DSL demand which is met by its own retail product (or the service of an affiliated provider), will be provisioned over all-copper loops (i.e., loops that do not include fiber feeder facilities) through at least 2002? Please provide a complete description of the basis for GTE's response.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services.

71. Explain in detail GTE's plans (or those of its affiliated retail DSL service provider) to implement DSL over Integrated Digital Loop Carrier ("IDLC"). Identify all documentation, including but not limited to analyses, reports and workpapers on the topic. If GTE does not currently have a plan to provide DSL over IDLC, please explain why and identify all documentation upon which GTE relied in arriving at that decision.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services. GTEFL further objects to this Interrogatory because, to the extent GTEFL has any responsive data, it is highly confidential competitive information.

72. To the best of its knowledge and belief, does GTE expect that any affiliated company will provide DSL services to end user customers whose local loops include any fiber cable? If anything other than an unqualified "no," please provide an outline of the overall arrangement of outside plant equipment (owned both by GTE and/or by GTE's affiliate) that GTE believes will most likely use to provide that service.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services.

73. Please provide the best estimates available within GTE of the percentage of access lines that will be used (in whole or in part) to provide ADSL, HDSL and G.Lite service residential end-users in 5 years. If GTE does not have an estimate in the specific format requested, please provide the data in GTE's possession that GTE believes most nearly approximates the requested information.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is proprietary, highly confidential and not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services. GTEFL further objects to this Interrogatory because, to the extent GTEFL has any responsive data, it is highly confidential competitive information.

74. Please provide the best estimates available within GTE of the percentage of access lines that will be used (in whole or in part) to provide ADSL, HDSL and G.Lite service business end-users in 5 years. If GTE does not have an estimate in the specific format requested, please provide the data in GTE's possession that GTE believes most nearly approximates the requested information.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is proprietary, highly confidential and not relevant to this proceeding. This proceeding is intended to establish rates for

unbundled network elements, not address matters pertaining to the provision of retail services. GTEFL further objects to this Interrogatory because, to the extent GTEFL has any responsive data, it is highly confidential competitive information.

75. Please provide the best available estimate within GTE of the average cost that GTE, its parent or purchasing affiliate will incur over the next few years (either internally or as a payment to a vendor) for equipment and related installation activities purchases of each of the following items. If the average price will differ for equipment types or by vendor, please provide a separate response for each type or vendor that GTE, its parent or their affiliates are likely to use (e.g., if a type of line card will differ for Lucent versus Alcatel equipment and both will be deployed, provide both costs separately). Please also describe the manner in which each estimate was developed and identify the source document from which each estimate was obtained, including the contract, memorandum of understanding, price list or comparable document that describes the terms, conditions and prices under which GTE and any affiliate would currently purchase the equipment.
- a) A new "broadband-capable" DLC system (If multiple capacity systems will be purchased, please identify the cost of each by manufacturer and model)
 - b) A new DSL-capable DLC system (If multiple capacity systems will be purchased, please identify the cost of each by manufacturer and model)
 - c) Central office DSLAM common equipment and shelf (i.e., the shelf, power supply and common equipment circuit boards for DSLAMs in a central office)
 - d) Central office DSLAM card or circuit board
 - e) Central office shelf required for installation of circuit boards containing splitter circuitry.
 - f) Central office line splitter cards
 - g) Upgrade to a DLC remote to accommodate DSLAM channel units and any necessary increase to feeder bandwidth to provide ADSL service.
 - h) ADSL channel units, including DSLAM and splitter functionality, for deployment in a DLC remote terminal.
 - i) DSX-3 manual patch panels, with installation (for interconnecting DS-3 signals from DSLAMs with transmission equipment within a wire center)
 - j) ATM edge switch, i.e., the ATM used as a means to aggregate and segregate data traffic between subscribers and service providers.
 - k) Installed cost per ATM switch (non-edge switch)
 - l) ADSL element manager, i.e. management of the ADSL multiplexers in the network (provisioning, monitoring and maintaining the network)
 - m) DSLAMs deployed outside of the central office in conjunction with outside plant (e.g., DSLAMS located at or near a feeder/distribution interface)
 - n) IDSL-capable plug in cards used in association with Digital Loop Carrier (DLC) equipment.
 - o) New controlled environment vault remote terminals
 - p) New hut remote terminals
 - q) New cabinet remote terminals
 - r) ADSL remote terminal combination plugs/cards (ADLU Cards)

- s) Central Office Optical Concentration Device (OCD)
- t) New Litespan 2000
- u) New Litespan 2012
- v) New UMC 1000

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that the phrase "related installation activities purchases" is vague and ambiguous.

76. Please provide the most detailed breakdown available of the cost that GTE or an affiliated company would most likely incur to upgrade existing DLC systems to support the delivery of ADSL services to end users. At a minimum please attempt to provide distinct estimates of any required upgrade cost for DLC common equipment, firmware, software and power supply. If GTE believes that upgrade costs will vary significantly by DLC manufacturer or by DLC unit size, please furnish a distinct set of estimates for each DLC system that GTE has deployed in Florida (e.g., Lucent SLC Series 5, Litespan 2000/2012, etc.).

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is proprietary, highly confidential and not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services. GTEFL further objects to this Interrogatory because, to the extent GTEFL has any responsive data, it is highly confidential competitive information.

77. Please provide GTE's best available estimate of appropriate TELRIC study labor rate for the GTE employee who would do the following tasks. Please show specifically how the labor rate was developed and identify each loading or other adder that is included in addition to the direct employee wage rate. Please also identify any order in which the methodology GTE reflects in its response was authorized.
- place line cards in a DLC RT
 - make cross connections at an FDI
 - install issue commands to control the routing of virtual paths and/or virtual circuits from a DLC RT
 - establish DSL circuits in an element manager
 - fiber cross connections within a central office

OSS

78. Please describe the types of incremental OSS costs that GTE anticipates it might incur associated with its pre-order, order and billing systems to provide xDSL loops to competitors. For each type of cost identified, if GTE believes that it would not

incur that cost to provide its own DSL retail service or to support the provision of DSL services by an affiliate, please explain why that is the case.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is proprietary, highly confidential and not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services. OSS costs associated with the provisioning of unbundled network elements will be addressed in the next phase of this proceeding.

79. Please describe the types of incremental OSS costs that GTE anticipates it might incur associated with updating inventory and provisioning systems to provide xDSL loops to competitors. For each type of cost identified, if GTE believes that it would not incur that cost to provide its own DSL retail service or to support the provision of DSL services by an affiliate please explain why that is the case.

OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is proprietary, highly confidential and not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services. OSS costs associated with the provisioning of unbundled network elements will be addressed in the next phase of this proceeding.

80. Please describe the types of incremental OSS costs that GTE anticipates it might incur associated with testing and maintenance to provide xDSL loops to competitors. For each type of cost identified, if GTE believes that it would not incur that cost to provide its own DSL retail service or to support the provision of DSL services by an affiliate please explain why that is the case.

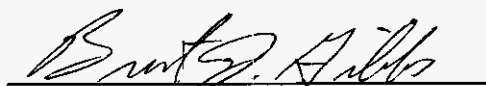
OBJECTION:

GTEFL objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and seeks information that is proprietary, highly confidential and not relevant to this proceeding. This proceeding is intended to establish rates for unbundled network elements, not address matters pertaining to the provision of retail services. OSS costs associated with the provisioning of unbundled network elements will be addressed in the next phase of this proceeding.

Task Times and SMEs

81. Please provide a complete list of task descriptions and task times GTE contends are associated with and therefore contribute to the cost of designing, provisioning, maintaining or repairing an xDSL loop.
82. Please identify by name, location, and job title every individual who supplied information referencing, regarding or relating to task descriptions and task times GTE contends are associated with designing, provisioning, maintaining or repairing each and every type of xDSL loop referenced in GTE's cost studies.
83. Please describe in detail why GTE believes each individual identified in response to Interrogatory No. 82 is qualified to supply information referencing, regarding or relating to task descriptions and task times associated with xDSL loops, including a description of each individual's qualifications and experience.
84. Please identify any and all documents referenced, referred to, associated with or produced by any individual identified in response to Interrogatory No. 82, in developing, calculating or otherwise deriving the task descriptions and task times GTE contends are associated with designing, provisioning, maintaining or repairing each and every type of xDSL loop referenced in GTE's cost studies.

Respectfully submitted,




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COUNSEL FOR GTE FLORIDA
INCORPORATED

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Objections to Rhythms Links, Inc.'s First Request for Production of Documents and First Set of Interrogatories in Docket No. 990649-TP were sent via facsimile and overnight mail(*) on May 30, 2000 and U.S. mail on May 31, 2000 to the parties on the attached list.



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