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November 13, 1996

Ms. Blanca S. Bayo, Director
Division of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 961173-TP
GTE Florida Incorporated's First Request for Production of Documents
and First Set of Interrogatories to Sprint Communications Company
Limited Partnership

Dear Ms. Bayo:

Please find enclosed for filing an original and fifteen copies of GTE Florida Incorporated's First Request for Production of Documents and First Set of Interrogatories to Sprint Communications Company Limited Partnership.

Service has been made as indicated on the Certificates of Service. If there are any questions regarding this matter, please contact me at (813) 483-2617.

Very truly yours,


Kimberly Caswell

KC:cd
Enclosures

A part of GTE Corporation

*Interrogatories
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's First Request for Production of Documents and GTE Florida Incorporated's First Set of Interrogatories to Sprint Communications Company Limited Partnership in Docket No. 961173-TP were hand-delivered (*) or sent via overnight mail (**) on November 13, 1996 to the parties listed below.

Monica Barone/Charlie Pellegrini (*)
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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305 S. Gadsden Street
Tallahassee, FL 32302



Kimberly Caswell

ORIGINAL FILED

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Sprint Communications)	Docket No. 961173-TP
Company Limited Partnership for Arbitration)	Filed: November 13, 1996
of Proposed Interconnection Agreement)	
with GTE Florida Incorporated Pursuant to)	
the Telecommunications Act of 1996)	
_____)	

GTE FLORIDA INCORPORATED'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP

GTE Florida Incorporated (GTEFL) requests that Sprint Communications Company Limited Partnership (Sprint) answer the following requests for production contained in Attachment A pursuant to Florida Rules of Civil Procedure.

DEFINITIONS AND INSTRUCTIONS

A. In these definitions and instructions, and in this Request for Production of Documents, the terms "you," "your" and "Company" mean Sprint Communications Company Limited Partnership, including its present or past employees, predecessors, divisions, departments, officers, directors, managers, supervisors, attorneys, consultants, agents, representatives, and all other persons acting for or purporting to act for Sprint.

B. In these definitions and instructions, and in this request for production of documents, the term "including" means "including but not limited to."

C. In these definitions and instructions, and in this request for production of documents, the term "document" is used in its broadest sense and means written,

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recorded, or graphic matter of every type of description in any medium in the possession, custody or control of Sprint, whether an original, copy, or draft, wherever located.

D. Whenever appropriate in these definitions and instructions, and in this request for production of documents, "and" as well as "or" shall be construed either disjunctively or conjunctively, "each" shall mean "each and every" and "all" shall mean "any and all" as necessary to bring within the scope of this request for production of documents any information which might otherwise be construed to be outside their scope.

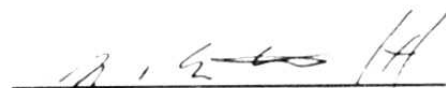
E. With respect to any communication, information or documents otherwise responsive to this request for production of documents which you withhold or refuse to divulge on a claim of privilege or work product, provide a statement, signed by an attorney, setting forth as to each such item of information or document:

- (i) The name(s) of the sender(s) of the document;
- (ii) the name(s) of the author(s) of the document;
- (iii) the name(s) of the person(s) to whom copies were sent;
- (iv) the job title(s) of every person(s) named in (i), (ii) and (iii) above;
- (v) the date of the document;
- (vi) the date on which the document was received by each person;
- (vii) a brief description of the nature and subject matter of the document; and
- (viii) the statute, rule or decision which is claimed to give rise to the privilege or immunity.

In the case of any document relating in any way to a meeting or conversation, provide the date and place of such meeting or conversation and a list of the participants.

Respectfully submitted on November 13, 1996.

By:



Kimberly Caswell
Post Office Box 110, FLTC0007
Tampa, Florida 33601
Telephone: 813-228-3094

Attorney for
GTE Florida Incorporated

Attachment A

1. Please provide copies of all Sprint press releases relating to the provisions of the Telecommunications Act of 1996.
2. Please provide copies of all Sprint press releases over the last twelve months relating to the provision of local exchange service by Sprint, including, but not limited to, all estimates of Sprint's potential market share.
3. Please provide copies of all promotional or marketing materials developed by or for Sprint regarding local exchange services.
4. Please provide copies of all reports, studies, analyses, internal company documents, memoranda or materials relating to Sprint's current marketing plans for local exchange service.
5. Please provide copies of all documents discussing or relating to Sprint's strengths in the local exchange marketplace or Sprint's relative advantages over other actual or potential local exchange competitors.
6. Please provide any engineering reports, studies, analyses, internal company documents, memoranda or materials relevant to Sprint's assessment of how or why Sprint's plans for interconnection with GTE's network are considered technically feasible.
7. To the extent Sprint has entered into arrangements with any incumbent local exchange carriers (ILECs) for interconnection that would require modifications to the ILEC's network to facilitate interconnection, please provide copies of any agreements, internal company memoranda, materials and other associated documents respecting such arrangements for modification of the ILEC's network and cost recovery for the same.
8. In addition to arrangements identified in response to item 7, above, to the extent Sprint has engaged in any discussions with ILECs regarding modification to the ILEC's network to facilitate interconnection and cost recovery, please provide copies of any agreements, internal company memoranda, materials and other associated documents relating to such discussions.
9. If Sprint currently receives inter-tandem switching service through interconnection on an ILEC's tandem in a multi-tandem LATA, please provide copies of any agreements, internal company memoranda, materials and other associated documents respecting such arrangements.

10. If Sprint currently receives inter-tandem switching service through interconnection on an ILEC's tandem in a multi-tandem LATA, please provide copies of any agreements, internal company memoranda, materials and other associated documents respecting such arrangements.
11. If Sprint has engaged in any discussions with ILECs regarding inter-tandem switching or the billing arrangement for such switching, please provide any reports, studies, analyses, internal company documents, memoranda or materials relating to such discussions.
12. Please provide all cost studies written or prepared by or for Sprint which identify Sprint's Total Service Long Run Incremental Cost (TSLRIC) or Total Element Long Run Incremental Cost (TELRIC) of intrastate interLATA long distance transport and intrastate intraLATA long distance transport per minute of use. With regard to any such studies, please provide all materials regarding (1) TSLRIC or TELRIC and (2) joint and common costs. Please provide the entire study including, but not limited to, all summaries, methodology, backup data, data inputs, documentation of mapping of inputs to the methodology used, detailed outputs, factors, assumptions, algorithms and weightings.
13. If Sprint has any arrangements with ILECs for mutual recovery of costs for transport and termination, please provide copies of all agreements, internal company memoranda, materials and other associated documents relating to such arrangements.
14. In addition to any arrangements identified in response to item 13, above, if Sprint has engaged in any discussions with ILECs regarding mutual recovery of costs for transport and termination, please provide any reports, studies, analyses, internal company documents, memoranda or materials relating to such discussions.
15. If Sprint has any arrangements with ILECs for meet point compensation of switched access revenues, please provide copies of all agreements, internal company memoranda, materials and other associated documents relating to such arrangements.
16. To the extent such the agreements, internal company memoranda, materials and other associated documents produced in response to item 15, above, include tandem allocation revenue arrangements and allocation percentages, please provide a copy of each report, study, analysis, internal company document, memorandum or other material which supports such allocation arrangements and allocation percentages.

17. In addition to any agreements, internal company memoranda, materials and other associated documents produced in response to item 15, if Sprint has engaged in any discussions with ILECs regarding meet point compensation of switched access service revenue, please provide any reports, studies, analyses, internal company documents, memoranda or materials relating to such discussions.
18. Please provide any engineering reports, studies, analyses, internal company documents, memoranda or materials supporting Sprint's assessment of how or why Sprint's plans for unbundling of the following network elements would be considered technically feasible:
 - a. Network Interface Device;
 - b. Loops, including, but not limited to, residential, business and coin operated pay telephone (COPT) loops;
 - c. Ports;
 - d. Local Switching;
 - e. Tandem Switching;
 - f. Asynchronous Transfer Mode (ATM) Switching;
 - g. Packet Switching;
 - h. Databases, including, but not limited to, LIDB, Toll Free 800, SCP, AIN and Directory Assistance;
 - i. SS7;
 - j. AIN Services and Functions;
 - k. Operator Services;
 - l. Directory Assistance;
 - m. 911 or E911 Service;
 - n. Operations Support Systems;
 - o. BLV/BLVI Service; and
 - p. Directory Listings.
19. To the extent Sprint has entered into arrangements with any ILECs for unbundling of network elements that would require modifications to the ILEC's network to facilitate unbundling, please provide copies of any agreements, internal company memoranda, materials and other associated documents respecting arrangements for such modification and cost recovery for the same.
20. In addition to any arrangements identified in response to item 19, above, has Sprint engaged in any discussions with ILECs regarding modification to the ILEC's network to facilitate unbundling and cost recovery? If so, please describe such discussions in detail, and provide any reports, studies, analyses, internal company documents, memoranda or materials relating to such discussions.

21. Please provide all reports, studies, analyses, internal company documents, memoranda or materials prepared by or for Sprint comparing the cost of purchasing services through unbundling as opposed to purchasing services through resale.
22. If Sprint currently offers any telecommunications services for resale, please provide all reports, studies, analyses, internal company documents, memoranda or materials providing support for Sprint's pricing of such services.
23. If there are circumstances under which Sprint would discount the price for telecommunications services at both a) retail and b) wholesale, please provide all reports, studies, analyses, internal company documents, memoranda or materials relating to the application of such discounts.
24. Please provide any reports, studies, analyses, internal company documents, memoranda or materials supporting Sprint's plans for physical or virtual collocation of equipment on GTE's premises.
25. If Sprint has any physical or virtual collocation arrangements with any ILECs, please provide copies of any agreements, internal company memoranda, materials and other associated documents respecting such arrangements.
26. In addition to any arrangements identified in response to item 25, above, if Sprint has engaged in any discussions with ILECs regarding physical or virtual collocation, please provide any reports, studies, analyses, internal company documents, memoranda or materials relating to such discussions.
27. If Sprint has any interim or permanent number portability arrangements with ILECs, please provide copies of any agreements, internal company memoranda, materials and other associated documents respecting such arrangements.
28. In addition to any arrangements identified in response to item 27, above, if Sprint has engaged in any discussions with ILECs regarding interim number portability, please provide any reports, studies, analyses, internal company documents, memoranda or materials relating to such discussions.
29. Please provide any reports, studies, analyses, internal company documents, memoranda or materials written or prepared by or for Sprint regarding the use of Local Exchange Routing Guide (LERG) Reassignment as a method for interim number portability, and compensation for the use of LERG Reassignment as a method for interim number portability.

30. Please provide any reports, studies, analyses, internal company documents, memoranda or materials written or prepared by or for Sprint regarding the use of any type of Directory Number Route Index (DNRI) as a method for interim number portability, and compensation for the use of any type of DNRI as a method for interim number portability.
31. Please provide any reports, studies, analyses, internal company documents, memoranda or materials written or prepared by or for Sprint regarding the use of Remote Call Forwarding (RCF) or Flexible Direct Inward Dialing (Flex-DID) as a method for interim number portability, and compensation for the use of any type of DNRI as a method for interim number portability.
32. If Sprint has any arrangements with ILECs for the sharing of access revenue as it relates to interim number portability, please provide copies of any agreements, internal company memoranda, materials and other associated documents respecting such arrangements.
33. Please provide any engineering reports, studies, analyses, internal company documents, memoranda or materials relevant to Sprint's assessment of how or why its plans for interconnection with GTE's network would be considered technically feasible.
34. Please provide copies of any agreements, internal company memoranda, materials or other associated documents relating to arrangements between Sprint and ILECs for the following:
 - a. Access to Operations Support Systems (OSS);
 - b. Compensation for such access;
 - c. Implementation of electronic interfaces for such access;
 - d. Primary Interexchange Carrier (PIC) changes;
 - e. Quality standards for OSS;
 - f. Branding for repair calls and service technicians;
 - g. Billing for third-party information service calls; and
 - h. Access to customer account information.
35. In addition to any arrangements identified in response to item 32, above, if Sprint has engaged in any discussions with ILECs regarding the issues listed at item 32, please provide any reports, studies, analyses, internal company memoranda, materials or other associated documents relating to such discussions.
36. Please provide all engineering reports, studies, analyses, internal company documents, memoranda or materials relevant to implementation of the electronic interface systems currently used or intended to be used by Sprint for access to operations support systems of other telecommunications carriers.

37. Please provide those agreements, internal company memoranda, materials and other associated documents entered into by Sprint with ILECs for interconnection, unbundling or resale of local services which include performance standards and remedies for failure to meet such performance standards.
38. In addition to documents produced in response to item 37, please provide all reports, studies, analyses, internal company documents, memoranda or materials supporting the amounts proposed by Sprint to be charged for a failure to meet performance standards.
39. In addition to any documents provided in response to item 37, above, if Sprint has engaged in any discussions with ILECs regarding remedies for failure to meet performance standards, please provide any reports, studies, analyses, internal company documents, memoranda or materials relating to such discussions.
40. If Sprint has any arrangements with any ILECs for access to poles, ducts, conduits and rights of way, please provide copies of any agreements, internal company memoranda, materials and other associated documents respecting such arrangements.
41. In addition to any arrangements identified in response to item 40, above, if Sprint has engaged in any discussions with ILECs regarding access to poles, ducts, conduits and rights of way, please provide any reports, studies, analyses, internal company documents, memoranda or materials relating to such discussions.
42. Please provide all versions of the Hatfield Study written or prepared by or for Sprint, including all reports, studies, analyses, internal company documents, memoranda or materials written or prepared by or for Sprint relating to such study.
43. Please provide those agreements, internal company memoranda, materials and other associated documents entered by Sprint with ILECs which provide prices for the following features, functions and services:
 - a. Interconnection with the local exchange;
 - b. Transport and termination of exchanged traffic;
 - c. Unbundling of network elements, including, but not limited to, the following:
 - (1) Network Interface Device;
 - (2) Loops, including, but not limited to, residential, business and coin operated pay telephone (COPT) loops;
 - (3) Ports;
 - (4) Local Switching;
 - (5) Tandem Switching;
 - (6) Asynchronous Transfer Mode (ATM) Switching;
 - (7) Packet Switching;

- (8) Databases, including, but not limited to, LIDB, Toll Free 800, SCP AIN and Directory Assistance;
 - (9) SS7;
 - (10) AIN Services and Functions;
 - (11) Operator Services;
 - (12) Directory Assistance;
 - (13) 911 or E911 Service;
 - (14) Operations Support Systems;
 - (15) BLV/BLVI Service; and
 - (16) Directory Listings.
- d. Resale of services;
 - e. Physical collocation;
 - f. Virtual collocation;
 - g. Number portability provided according to the following methods:
 - (1) RCF;
 - (2) Flex-DID;
 - (3) DNRI end office;
 - (4) DNRI tandem hubbing;
 - (5) LERG Reassignment.
44. Please provide the most recent cost studies prepared by or for Sprint regarding the features, functions and services listed above at item 43, including, but not limited to, studies regarding (1) TSLRIC or TELRIC, (2) joint and common costs and (3) marketing, billing, collection and other costs that will be avoided by a telecommunications provider for any resold services. Please provide the entire study including, but not limited to, all summaries, methodology, backup data, data inputs, documentation of mapping of inputs to the methodology used, detailed outputs, factors, assumptions, algorithms and weightings.
45. With regard to factors and inputs used in cost studies provided in response to item 44 above, please provide copies of the calculations, work paper, algorithms, backup data and assumptions used to compute each of the following factors:
- a. Maintenance;
 - b. Testing (reactive);
 - c. Testing (proactive);
 - d. Administrative-assignable;
 - e. Product Management;
 - f. Sales Expense;
 - g. Business Fees;
 - h. Joint Costs;
 - i. Common Costs;
 - j. Ad Valorem;
 - k. Sales Compensations Expense;

- l. Administrative-common;
 - m. Power;
 - n. Sales Tax;
 - o. Interest During Construction (IDC);
 - p. Land;
 - q. Building;
 - r. Supply;
 - s. Telco;
 - t. RTUF; and
 - u. Structure Ratios.
46. Please provide all cost studies, in accord with items 43 and 44, regarding the features, functions and services listed above at 43, which relate to, support or were developed by Sprint in connection with negotiations between Sprint and GTE or between Sprint and any ILEC.
47. To the extent not already provided under items 43 and 44, above, please provide all cost studies implementing or otherwise applying the Hatfield Study to the features, functions and services listed above at 43.
48. Please provide all reports, studies, analyses, internal company documents, memoranda or materials written or prepared by or for Sprint of any cost savings Sprint expects to generate by unbundling or reselling the features, functions and services of GTE's network rather than by constructing its own facilities to provide the same features, functions and services in the same geographic area. Please include all reports, studies, analyses, internal company documents, memoranda or materials relevant to how cost savings might affect Sprint's rates for service other than local exchange service, including, but not limited to, interLATA or long distance service.
49. Please provide all reports, studies, analyses, internal company documents, memoranda or materials written or prepared by or for Sprint identifying potential savings to Sprint of access charges as a result of entering local exchange service through interconnection with and unbundling and resale of ILEC network elements and services.
50. Please provide the most recent cost studies prepared by or for Sprint regarding services or elements in the following list, including, but not limited to, studies regarding (1) Total Service Long Run Incremental Costs (TSLRIC) or Total Element Long Run Incremental Costs (TELRIC), (2) joint and common costs and (3) marketing, billing, collection and other costs that will be avoided by a telecommunications provider for any resold services. Please provide the entire study including, but not limited to, all summaries, methodology, backup data, data inputs,

documentation of mapping of inputs to the methodology used, detailed outputs, factors, assumptions, algorithms and weightings:

- a. intrastate interLATA telephone service;
- b. intrastate intraLATA telephone service;
- c. WATS inbound or outbound services;
- d. transmission facilities used for interLATA telephone service;
- e. switching facilities used for interLATA telephone service; and
- f. any other services offered at retail or wholesale.

51. With regard to factors and inputs used to in cost studies provided in response to item 50 above, please provide copies of the calculations, work papers, algorithms, backup data and assumptions used to compute each of the following factors:

- a. Maintenance;
- b. Testing (reactive);
- c. Testing (proactive);
- d. Administrative-assignable;
- e. Product Management;
- f. Sales Expense;
- g. Business Fees;
- h. Joint Costs;
- i. Common Costs;
- j. Ad Valorem;
- k. Sales Compensations Expense;
- l. Administrative-common;
- m. Power;
- n. Sales Tax;
- o. Interest During Construction (IDC);
- p. Land;
- q. Building;
- r. Supply;
- s. Telco;
- t. RTUF; and
- u. Structure Ratios.

52. Please provide copies of all documents Sprint produced to the Florida Public Service Commission Staff in response to Staff's First Request for Production of Documents in this docket.

Attachment A

GTE's First Set of Requests for Production of Documents to Sprint

1. Please provide any engineering reports, studies, analyses, internal company documents, memoranda or materials relevant to Sprint's assessment of how and why its plans for interconnection with GTE's network would be considered technically feasible.
2. Please provide all cost studies written or prepared by or for Sprint which identify Sprint's Total Service Long Run Incremental Cost (TSLRIC) or Total Element Long Run Incremental Cost (TELRIC) of intrastate interLATA long distance transport and intrastate intraLATA long distance transport per minute of use. With regard to any such studies, please provide all materials regarding (1) TSLRIC or TELRIC and (2) joint and common costs. Please provide the entire study including, but not limited to, all summaries, methodology, backup data, data inputs, documentation of mapping of inputs to the methodology used, detailed outputs, factors, assumptions, algorithms and weightings. Please specifically identify the amount by which Sprint's identified costs for intrastate interLATA long distance transport and intrastate intraLATA long distance transport exceed the TSLRIC or TELRIC of such transport.
3. If Sprint has any arrangements with ILECs for meet point compensation of switched access revenues, please provide copies of all agreements, internal company memoranda, materials and other documents relating to such arrangements.
4. Please provide any engineering reports, studies, analyses, internal company documents, memoranda or materials supporting Sprint's assessment of the technical feasibility of GTE's

unbundling the following:

- a. Network interface device;
- b. Loops, including, but not limited to, residential, business and coin-operated pay

telephone (COPT) loops;

- c. Ports;
- d. Local switching;
- e. Tandem switching;
- f. Asynchronous Transfer Mode (ATM) switching;
- g. Packet switching;
- h. Databases, including, but not limited to, LIDB, Toll Free 800, SCP, AIN and Directory

Assistance;

- i. SS7;
- j. AIN services and functions;
- k. Operator services;
- l. Directory assistance;
- m. 911 or E911 service;
- n. Operations support systems;
- o. BLV/BLVI service; and
- p. Directory listings.

5. Please provide all reports, studies, analyses, internal company documents, memoranda or materials prepared by or for Sprint comparing the cost of purchasing services through unbundling as opposed to purchasing services through resale.

6. For those GTE premises at which Sprint wishes to virtually or physically collocate, please provide any engineering reports, studies, analyses, internal company documents, memoranda or materials supporting Sprint's plans for such collocation.

7. If Sprint has any interim or permanent number portability arrangements with any ILECs, please provide copies of any agreements, internal company memoranda, materials and other documents respecting such arrangements.

8. Please provide any reports, studies, analyses, internal company documents, memoranda or materials written or prepared by or for Sprint regarding the use of and compensation for the interim number portability methods of Remote Call Forwarding (RCF) and Flexible Direct inward Dialing (Flex-DID).

9. If Sprint has any arrangements with ILECs for the sharing of access revenue as it relates to interim number portability, please provide copies of any agreements, internal company memoranda, materials and other associated documents respecting such arrangements.

10. Please identify all arrangements between Sprint and any ILECs for access to poles, ducts, conduits and rights of way and provide copies of any agreements, internal company memoranda, materials and other associated documents respecting such arrangements.

11. Please provide all reports, studies, analyses, internal company documents, memoranda or materials written or prepared by or for Sprint identifying potential savings to Sprint of access

charges as a result of providing local exchange service through interconnection with the ILEC network and unbundling and resale of ILEC network elements and services.

12. Please provide all reports, studies, analyses, internal company documents, memoranda or materials written or prepared by or for Sprint of any cost savings Sprint expects to generate by unbundling or reselling the features, functions and services of GTE's network rather than by constructing its own facilities to provide the same features, functions and services in the same geographic area. Please include all reports, studies, analyses, internal company documents, memoranda or materials relevant to how cost savings might affect Sprint's rates for service other than local exchange service, including, but not limited to, interLATA or long distance service.

13. Please provide any reports, studies, analyses, or other materials prepared by or for United Telephone Company of Florida (United) or Central Telephone Company of Florida (Centel) that show or discuss United's and Centel's costs, respectively, of providing the network elements Sprint has asked GTE to unbundle in this arbitration.

14. Please provide all documents that discuss the methodology that United and Centel believe is appropriate to use in pricing their respective unbundled network elements to be offered to companies interconnecting with United and Centel, respectively, pursuant to the Telecommunications Act of 1996.

15. Please provide any reports, studies, analyses, or other materials prepared by or for United or Centel that show or discuss the costs that United and Centel, respectively, will avoid in offering

their retail services at wholesale to other companies pursuant to the Telecommunications Act of 1996.

16. Please provide all documents that discuss the methodology that United and Centel, respectively, believe is appropriate to use in pricing their respective retail services at wholesale for purposes of complying with the Telecommunications Act of 1996.