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January 23, 2001

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RECORDS AND
REPORTING

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

Re: Docket No. 990362-TI
Initiation of Show Cause Proceeding Against GTE Communications
Corporation for Apparent Violation of Rule 25-4.118, F.A.C., Local, Local Toll,
or Toll Provider Selection

Dear Ms. Bayo:

Please find enclosed for filing an original and fifteen copies of Verizon Select Services Inc.'s Response to the Office of Public Counsel's First Motion to Compel in the above matter. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this matter, please contact me at 813-483-2617.

Sincerely,

Kimberly Caswell

KC:tas
Enclosures

- APP _____
- CAF _____
- CMP _____
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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Initiation of Show Cause Proceeding) Docket No. 990362-TI
against GTE Communications Corporation) Filed: January 23, 2001
for Apparent Violation of Rule 25-4.118,)
F.A.C., Local, Local Toll, or Toll Provider)
Selection)
_____)

**VERIZON SELECT SERVICES INC.'S RESPONSE TO THE
OFFICE OF PUBLIC COUNSEL'S FIRST MOTION TO COMPEL**

Verizon Select Services Inc. (VSSI) (formerly GTE Communications Corporation) responds to the First Motion to Compel filed by the Office of Public Counsel on January 16, 2001.

OPC's document requests numbered 17 and 18, which are at issue here, ask for all documents "relating to compensation plans" for all of GTECC's officers for 1998. VSSI objected to these requests because they are overbroad, unduly burdensome, and the terms used in the requests (such as "personal commitment") are vague and ambiguous. VSSI stands on these objections. OPC would have VSSI produce all documents, rather than just those sufficient to establish the officers' compensation, and it seeks documents that have nothing to do with long-distance sales. As such, much of the information sought is not relevant to any issue in this proceeding.

In any event, VSSI does not believe there is any need for the Commission to rule on OPC's Motion. As VSSI stated in its objections, VSSI is willing to work with OPC to determine which documents are potentially relevant and responsive to OPC's requests. OPC's motion acknowledges that the parties continue to work together to "reach an accommodation on the production of these documents." (Motion at 5.) To this end, VSSI is currently gathering documents to determine what might be produced.

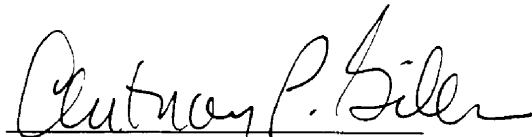
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For these reasons, VSSI believes OPC's Motion is unnecessary and asks the Commission to decline to rule on it.

Respectfully submitted on January 23, 2001.

By: 
on Kimberly Caswell
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Tampa, FL 33601
Telephone: (813) 483-2617

Attorney for Verizon Select Services Inc.

CERTIFICATE OF SERVICE

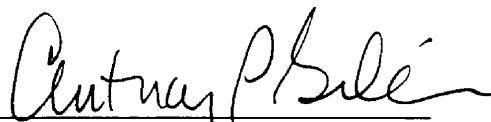
I HEREBY CERTIFY that copies of Verizon Select Services Inc.'s Response to the Office of Public Counsel's First Motion to Compel in Docket No. 990362-TI were sent via overnight delivery(*) on January 22, 2001 and U.S. mail(**) on January 23, 2001 to:

Lee Fordham(*)
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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Office of Public Counsel
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Tallahassee, FL 32399-1400

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