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October 23, 1990


Mr. Steve C. Tribble, Director  
Division of Records & Reporting  
Florida Public Service Commission  
101 W. Gaines Street  
Tallahassee, FL 32399-0865

Dear Mr. Tribble:

Re: Docket No. 891194-TL  
Proposed Tariff Filing by Southern Bell Telephone  
and Telegraph Company Clarifying When a Nonpublished  
Number Can Be Disclosed and Introducing Caller ID to  
Touchstar Service

ACK \_\_\_\_\_  
AFA \_\_\_\_\_  
APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CND \_\_\_\_\_  
CTR \_\_\_\_\_  
Please find enclosed the original and 15 copies of GTE  
Florida Incorporated's Notice of Responses and Objections  
to Public Counsel's First Set of Requests for Production of  
Documents and Motion for Temporary Protective Order for  
filing in the above stated matter.

EAS \_\_\_\_\_  
LEG \_\_\_\_\_  
LIM \_\_\_\_\_  
Service has been made as indicated on the attached  
Certificate of Service. If there are any questions with  
regard to this matter, please contact the undersigned at  
(813) 228-3087.

GPO \_\_\_\_\_  
RCH \_\_\_\_\_  
SEE \_\_\_\_\_  
W/S \_\_\_\_\_  
TF: FM  
Enclosures  
Very truly yours,  
  
Thomas R. Parker

RECEIVED & FILED

GTE Florida Incorporated  
GTE South Incorporated  
A part of GTE Corporation

REC'D-RECORDS OF RECORDS

DOCUMENT 100-100000

09444 901 23 1990

REC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed Tariff Filing by )  
Southern Bell Telephone and Telegraph ) Docket No. 891194-TL  
Company Clarifying When a Nonpublished ) Filed: 10-23-90  
Number Can Be Disclosed and Introducing )  
Caller ID to TouchStar Service. )

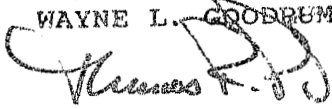
NOTICE OF SERVICE OF GTE FLORIDA INCORPORATED'S  
RESPONSES AND OBJECTIONS TO CITIZENS' FIRST SET  
OF REQUESTS FOR PRODUCTION OF DOCUMENTS AND  
MOTION FOR TEMPORARY PROTECTIVE ORDER

NOTICE IS HEREBY GIVEN that a true and correct copy of GTE Florida Incorporated's Responses and Objections to Citizens' First Set of Request for Production of Documents which were propounded by the Public Counsel on September 18, 1990, has been hand-delivered to the Director, Division of Records and Reporting, at the Commission. A copy of this notice has also been hand-delivered to Charles J. Beck, Public Counsel, Office of the Public Counsel, c/o The Florida Legislature, 111 West Madison Street, Room 812, Tallahassee, FL 32399-1400, this the 23rd day of October, 1990. Further service on other parties of record is as set forth on the Certificate of Service, appended hereto.

Respectfully submitted this the 23rd day of October,  
1990.

JAMES V. CARIDEO  
THOMAS R. PARKER  
JOE W. FOSTER  
WAYNE L. GOODRUM

By:

  
Thomas R. Parker  
Associate General Counsel  
GTE Florida Incorporated  
Post Office Box 110, MC 7  
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DOCUMENTS

09444 OCT 23 1990

RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed Tariff Filing by  
Southern Bell Telephone and Telegraph ) Docket No. 891194-TL  
Company Clarifying When a Nonpublished ) Filed: 10-23-90  
Number Can Be Disclosed and Introducing)  
Caller ID to TouchStar Service. )

GTE FLORIDA INCORPORATED'S RESPONSE AND  
OBJECTIONS TO PUBLIC COUNSEL'S FIRST SET OF  
REQUESTS FOR PRODUCTION OF DOCUMENTS AND  
MOTION FOR TEMPORARY PROTECTIVE ORDER

In accordance with Fla. Admin. Code Ann. r. 25-22.034 and Fla. R. Civ. P. 1.350, GTE Florida Incorporated ("GTEFL") hereby submits its Response and Objections to Public Counsel's First Set of Requests for Production of Documents.

I. General Objections

GTEFL's Specific Responses to the above-referenced discovery request of Public Counsel are offered subject to the General Objections set forth below. In addition, GTEFL expressly reserves the right to amend, supplement, or correct its answers herein.

1. GTEFL objects to each request for production of documents insofar as the request is vague, overbroad, ambiguous, or imprecise.

2. GTEFL objects to each request for production of documents insofar as the request seeks information subject to the attorney-client, work product, or other privilege.

3. GTEFL objects to each request for production of documents insofar as the request is not reasonably calculated

to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

4. GTEFL objects to each request for production of documents insofar as it seeks documents that contain proprietary, confidential business information. Public Counsel's broad discovery requests encompass virtually all documents concerning GTEFL's Calling Number Identification service, as well as extensive information with respect to several other CLASS offerings. In order to respond to these requests, GTEFL will need to produce business plans, market research, revenue projections, pricing data and other material closely guarded by the company. Such documentation falls squarely within the statutory definition of confidential business data, as "[i]nformation relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information." Fla. Stat. §364.183(3). As such, GTEFL asks the Commission to issue a Temporary Protective Order to exempt such information from §119.07, Florida Statutes. In accordance with the terms of Commission Rule 25-22.006(5)(c), GTEFL will permit Public Counsel to inspect or take possession of responsive material for which GTEFL seeks confidential treatment, so that Public Counsel may determine what information it wishes to use at the hearing in this proceeding. If Public Counsel designates for use any confidential documents, GTEFL will then file a specific request for a protective order to apply to such documents, as required by paragraph (a) of Rule 25-22.006(5).

## II. Specific Responses and Objections

1. Please provide each document in your possession, custody, or control discussing, evaluating, or otherwise commenting on the effect of Caller ID or Call Trace on any group of your customers or on your customers as a whole.

Response: GTE Florida will produce responsive documents at a mutually acceptable time and location.

2. Please provide each document in your possession, custody, or control discussing, evaluating, or otherwise commenting on the effect of Caller ID on your customers subscribing either to unlisted or nonpublished number.

Response: GTE Florida will produce responsive documents at a mutually acceptable time and location.

3. Please provide each document in your possession, custody, or control discussing, evaluating, or otherwise commenting on the use of recurring (i.e., monthly) or non-recurring (i.e., per-call) rate structures for Call Trace.

Response: GTE Florida will produce responsive documents at a mutually acceptable time and location.

4. Please provide your business plans for (i) Caller ID, (ii) Call Trace, (iii) Call Return, and (iv) each service (either regulated or unregulated) you plan to offer that will or may use Caller ID either in conjunction with or as part of the service.

Response: GTE Florida will produce responsive documents at a mutually acceptable time and location.

5. Please provide each document in your possession, custody, or control concerning any surveys done by you or others about customers' perception of, or anticipated or actual reaction to, Caller ID, Call Trace, Call Block, or Call Return.

Response: GTE Florida will produce responsive documents at a mutually acceptable time and location.

6. Please provide each document in your possession, custody, or control evaluating, analyzing, or otherwise commenting on any of the documents responsive to the preceding document request.

Response: GTE Florida will produce responsive documents at a mutually acceptable time and location.

7. Please provide each document in your possession, custody, or control discussing, evaluating, or otherwise commenting on customers' interest in, or the anticipated response by customers to, Caller ID, Call Block, Call Trace, or Call Return.

Response: GTE Florida will produce responsive documents at a mutually acceptable time and location.

8. Please provide each document in your possession, custody, or control discussing, evaluating, or otherwise commenting on the substitutability of Caller ID, Call Trace, Call Block, or Call Return with each other or with any other service.

Response: GTE Florida will produce responsive documents at a mutually acceptable time and location.

9. Please provide each document in your possession, custody, or control discussing, evaluating, or otherwise analyzing the price elasticity of demand or cross elasticity of demand of Caller ID, Call Trace, Call Block or Call Return.

Response: GTE Florida has prepared no studies analyzing the price elasticity of demand or cross-elasticity of demand of Caller ID, Call Tracing Service, Call Block or Call Return. Therefore, there are no documents responsive to this request.

10. Please provide each survey, questionnaire, or other document in your possession, custody, or control discussing, analyzing, or otherwise commenting on crank, harassing, or nuisance calls, or customers' perceptions toward crank, harassing, or nuisance calls.

Response: GTE Florida will produce responsive documents at a mutually acceptable time and location.

Respectfully submitted this the 23rd day of October, 1990.


JAMES V. CARIDEC  
THOMAS R. PARKER  
WAYNE L. GOODRUM  
JOSEPH W. FOSTER



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of GTE Florida Incorporated's Responses and Objections to Public Counsel's First Set of Requests for Production of Documents and Motion for Temporary Protective Order in Docket No. 891194-TL has been furnished by U.S. mail on this the 23rd day of October, 1990, to the parties on the attached list



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