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

September 30, 1996

Re: Docket Nos. 960847-TP and 960980-TP
Petitions by AT&T Communications of the Southern States, Inc.,
MCI Telecommunications Corporation and MCI Metro Access
Transmission Services, Inc. for arbitration of certain terms and conditions
of a proposed agreement with GTE Florida Incorporated concerning
interconnection and resale under the Telecommunications Act of 1996

Dear Ms. Bayo:

In accordance with the procedural order in this case, please find enclosed for filing an original and fifteen copies of GTE Florida Incorporated's preliminary Objections to AT&T Communications of the Southern States, Inc.'s First Set of Interrogatories and First Request for Production of Documents in the above matters. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this matter, please contact me at (813) 228-3094.

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- LIN 5 KC:tas
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

Very truly yours,

Anthony P. Gillman for/dm

Kimberly Caswell

Enclosures

A part of GTE Corporation

RECEIVED & FILED

interrogatories
DOCUMENT NUMBER-DATE

production of documents
DOCUMENT NUMBER-DATE

FPSC-RECORDS/REPORTING 10517 OCT-1 1996

10518 OCT-1 1996

FPSC-RECORDS/REPORTING

FPSC-RECORDS/REPORTING


CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Objections to AT&T Communications of the Southern States, Inc.'s First Set of Interrogatories and First Request for Production of Documents in Docket No. 960847-TP were sent via facsimile transmission on September 30, 1996 to the parties listed below.

Donna Canzano
Division of Legal Services
Florida Public Service Commission
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Tallahassee, FL 32399-0850

Tracy Hatch/Michael W. Tye
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Kimberly Caswell

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petitions by AT&T Communications of the)	Docket No. 960847-TP
Southern States, Inc., MCI Telecommunications)	Docket No. 960980-TP
Corporation and MCI Metro Access Transmission)	
Services, Inc., for arbitration of certain terms and)	Filed: September 30, 1996
conditions of a proposed agreement with GTE)	
Florida Incorporated concerning interconnection)	
and resale under the Telecommunications Act of)	
1996.)	

GTE FLORIDA INCORPORATED'S OBJECTIONS
TO AT&T'S FIRST SET OF INTERROGATORIES
(NOS. 1 THROUGH 68)

GTE Florida Incorporated (GTEFL) hereby files its objections to the following interrogatories served upon it by AT&T. These objections are being filed pursuant to the Initial Order Establishing Procedure (Order No. PSC-96-1053-PCO-TP). GTEFL reserves the right to make additional objections as it becomes aware of facts justifying further objections. GTEFL's objections are as follows:

- 1) List all grand fathered and obsolete services, quantify the scope or size of the market for each service, and identify each service not available for resale.

Objection: GTEFL objects to this request to the extent that it seeks information that is irrelevant and that will not lead to the discovery of relevant or otherwise admissible information. The scope and size of the market for GTEFL's services is not germane to determining the terms of interconnection, unbundling, and resale as between GTEFL and AT&T. AT&T has no legitimate need for this competitively sensitive market information. GTEFL objects to this question on the additional ground that it seeks information that is confidential and proprietary to GTEFL. Notwithstanding these objections, GTEFL will respond to the extent that the question is relevant to the issues in this case.

- 2) List all existing Contract Service Arrangements, individual case basis arrangements and special assemblies, quantify the scope or size of the market for each service or arrangement and identify the specific service or arrangement not available for resale.

Objection: GTEFL objects to this request to the extent that it seeks information that is irrelevant and that will not lead to the discovery of relevant or otherwise admissible information. The scope and size of the market for GTEFL's services is not germane to determining the terms of interconnection, unbundling, and resale as between GTEFL and AT&T. AT&T has no legitimate need for this competitively sensitive market information. GTEFL objects to this question on the additional ground that it seeks information that is confidential and proprietary to GTEFL. Notwithstanding these objections, GTEFL respond to the extent that the question is relevant to the issues in this docket.

- 3) Identify the following:
 - a. recurring and nonrecurring costs for each item listed in document Request 6.;
 - b. the costs of each item listed in Document Request 6 when provided as a residential service;
 - c. the costs of each item listed in Document Request 6 when provided as a business service, separately identifying costs for single-line service, multi-line service, PBX trunks, network access register packages and coin telephone services.

Objection: GTEFL objects to this request because it seeks information that is confidential, proprietary and competitively sensitive. Notwithstanding this objection, GTEFL will responds in accordance with the terms of an appropriate protective agreement.

- 4) Identify the current Total Long Run Incremental Cost (TSLRIC) of the following with regard to both switched and non-switched (special) access service in the State of Florida for:

- a. local switching;
- b. tandem switching;
- c. information surcharge (where applicable);
- d. RIC;
- e. DS1, per termination;
- f. DS1, per mile;
- g. DS3, per termination; and
- h. DS3, per mile.

If the TSLRIC for a category listed above is not available, identify the LRIC.

Objection: GTEFL objects to this request because it seeks information that is confidential, proprietary and competitively sensitive. Notwithstanding this objection, GTEFL will respond in accordance with the appropriate protective agreement.

- 5) Provide a complete description of various cost components included in weighted unit cable costs used to calculate loop investments within the loop studies provided to the Florida Public Service Commission in conjunction with Docket No. 950984-TP. For each aerial, underground and buried weighted unit cost per pair foot, identify separately the percentage of the cost attributable to each of the following:

- a. non-exempt material;
- b. exempt material;
- c. telephone company (Telco) engineering;
- d. telephone company (Telco) labor;
- e. contract engineering and labor;
- f. structure; and
- g. other.

Objection: GTEFL objects to this request because it seeks information that is confidential, proprietary and competitively sensitive. Notwithstanding this objection, GTEFL will respond in accordance with the terms of the appropriate protective agreement with AT&T.

- 6) For the loop study submitted by GTEFL to the Florida Public Service Commission in conjunction with Docket No. 950984-TP, provide the following:
- a. Explain the procedures used to determine non-exempt and exempt material ratios and explain how the ratios were developed;
 - b. For Telco engineering and labor costs, identify individually the percentage attributed to the various components of direct engineering costs, the various components of direct labor costs and the various separately identified engineering and labor rate loadings and explain how the percentages were developed;
 - c. Explain the procedures used to determine structure loading; and
 - d. Identify the percentage of aerial, underground and buried weighted unit cost attributed to functions or components other than those listed in Interrogatory 5(a) through 5(g) above. The response to this Interrogatory should identify the specific function or component to which each cost is attributed.

Objection: GTEFL objects to this request because it seeks information that is confidential, proprietary and competitively sensitive. Notwithstanding this objection, GTEFL will respond in accordance with the appropriate protective agreement.

- 7) Identify the GTEFL costs for 1995 for each of the following categories/accounts, separately identifying the amounts attributable to residence and to business service and for any other category available (e.g., local, toll, private line, etc.):
- a. Produce management -- Account 6611
 - b. Sales -- Account 6612
 - c. Product advertising -- Account 6613
 - d. Customer services -- Account 6623
 - e. Operations testing -- Account 6533;
 - f. Operations plant administration -- Account 6534;
 - g. Call completion -- Account 6621
 - h. Directory assistance -- Account 6622
 - i. Deprecation -- Operator Systems;
 - j. Network -- CO -- Operator Systems -- Account 6220

- k. Network support -- Accounts 6120 and 6110
- l. Depreciation support -- 6560
- m. General and administrative -- Provide individual amounts for Accounts 6711, 6712, 6722, 6723, 6724, 6726, 6727 and 6728;
- n. Taxes -- Account 7240 (separating amounts assessed based on revenue and those based on property);
- o. Customer deposit expense -- Account 7540;
- p. Plant in service investment split between residential, business, and any other category available.

Objection: GTEFL objects to this request because it seeks information that is confidential, proprietary and competitively sensitive. GTEFL will answer this question, to the extent that it is relevant, only in accordance with the terms of the appropriate protective order.

10) Provide the following for 1995 Operator Services revenue in Florida:

- a. Separately identify call completion revenues and total operator work time by account (e.g., local, toll, access, etc.) and include the amount, account number and account description for each;
- b. Separately identify call Directory Assistance revenues and total assistance operator work time by account (e.g., local, toll, access, etc.) and include the amount, account number and account description for each; and
- c. Separately identify any other Operator Services revenues and related total work times by account (e.g., local, toll, access, etc.) and include the amount, account number and account description for each.

Objection: GTEFL objects to this request because it does not seek relevant information and is not designed to lead to the discovery of relevant information. GTEFL's revenues for particular services are not germane to the Commission's determination of the terms governing interconnection, resale, and unbundling as between GTEFL and AT&T. AT&T has no legitimate reason for these competitively sensitive data. GTEFL objects to the question on the additional ground that it seeks information that is confidential and proprietary.

- 11) Provide the 1995 Directory Assistance call volumes for Florida and separately identify the specific volumes attributable to the toll, local, access and any other service categories in which these volumes are maintained.,

Objection: GTEFL objects to this question because it seeks information that is irrelevant and it is not designed to lead to the discovery of relevant information. GTEFL's directory assistance call volumes are not germane to this Commission's decisions regarding the terms of interconnection, unbundling, and resale as between GTEFL and AT&T. AT&T has no need for these competitively sensitive data. In addition, GTEFL objects to this question because it seeks information that is proprietary and confidential.

- 12) Identify and describe the categories of costs included in the calculation of Total Service Long Run Incremental Cost (TSLRIC).

Objection: GTEFL objects to this request because it seeks information that is confidential, proprietary and competitively sensitive. Notwithstanding this objection, GTEFL will respond, to the extent the question is relevant, under the terms of the appropriate protective agreement.

- 13) Identify and describe the categories of costs included in the calculation of Total Element Long Run Incremental Cost (TELRIC).

Objection: GTEFL objects to this request because it seeks information that is confidential, proprietary and competitively sensitive. Notwithstanding this objection, GTEFL will respond, to the extent the question is relevant, under the terms of the appropriate protective agreement.

- 14) Identify and describe the categories of costs included in the calculation of Long Run Incremental Cost (LRIC).

Objection: GTEFL objects to this request because it seeks information that is confidential, proprietary and competitively sensitive. Notwithstanding this objection, GTEFL will respond, to the extent the question is relevant, under the terms of the appropriate protective agreement.

- 26) Identify the extent to which "common costs" are included in : (a) TSLRIC, (b) LRIC and (c) TELRIC.

Objection: GTEFL objects to this request because it seeks information that is confidential, proprietary and competitively sensitive. Notwithstanding this objection, GTEFL will respond, to the extent the question is relevant, under the terms of the appropriate protective agreement.

- 27) Identify the extent to which "shared costs" are included in (a) TSLRIC, (b) LRIC, and (c) TELRIC.

Objection: GTEFL objects to this request because it seeks information that is confidential, proprietary and competitively sensitive. Notwithstanding this objection, GTEFL will respond, to the extent the question is relevant, under the terms of the appropriate protective order.

- 28) Identify the extent to which "joint costs" are included in (a) TSLRIC, (b) LRIC, and (c) TELRIC.

Objection: GTEFL objects to this request because it seeks information that is confidential, proprietary and competitively sensitive. Notwithstanding this objection, GTEFL will respond, to the extent the question is relevant, under the terms of the appropriate protective order.

- 29) Identify the extent to which "overhead costs" are included in (a) TSLRIC, (b) LRIC, and (c) TELRIC.

Objection: GTEFL objects to this request because it seeks information that is confidential, proprietary and competitively sensitive. Notwithstanding this objection, GTEFL will respond, to the extent the question is relevant, under the terms of the appropriate protective agreement.

- 30) Identify the extent to which "embedded costs" are included in (a) TSLRIC, (b) LRIC, and (c) TELRIC.

Objection: GTEFL objects to this request because it seeks information that is confidential, proprietary and competitively sensitive. Notwithstanding this objection, GTEFL will respond, to the extent the question is relevant, under the terms of the appropriate protective agreement.

- 31) With respect to GTEFL's proposal to AT&T regarding prices for unbundled network elements:
- a. Describe in detail the derivation of each rate element and rate level associated with each rate element involved in the determination of unbundled network element price;
 - b. Describe in detail the most recent estimate of TSLRIC (or, to the extent TSLRIC has not been calculated, the LRIC) associated with the provision of each rate element involved in the provision of unbundled network elements;
 - c. Describe in detail the extent to which (1) joint costs, (2) common costs, (3) shared costs, (4) overhead costs, and (5) embedded costs (individually by category) are included in the TSLRIC, LRIC and price of each rate element; and
 - d. Identify the sources of support for the details provided in a., b., and c. above.

Objection: GTEFL objects to this request because it seeks information that is confidential, proprietary and competitively sensitive. Notwithstanding this objection, GTEFL will respond, to the extent the question is relevant, under the terms of the appropriate protective agreement.

- 32) Describe in detail the TSLRIC (or, to the extent the TSLRIC has not been calculated, the LRIC) associated with each rate element and rate level associated with each rate element in GTEFL cost studies conducted from January 1, 1992 to the present date.

Objection: GTEFL objects to this request to the extent that it seeks cost study information that has been superseded by more current cost studies. This old information is not relevant to determining the terms of interconnection, unbundling, and resale as between GTEFL and AT&T. GTEFL has produced its current cost study to AT&T. AT&T has no legitimate reason for outdated cost studies. GTEFL also objects to this request because it seeks information that is confidential and proprietary.

- 35) Identify any detail service which GTEFL has offered since January 1, 1995, where the retail price of the service is below TSLRIC.

Objection: GTEFL objects to this request to the extent that it seeks information that is confidential, proprietary, and competitively sensitive. Notwithstanding this objection, GTEFL will respond, to the extent the question is relevant, under the terms of the appropriate protective order.

- 36) For each state in which GTE operates, identify GTE's most recent authorized rate of return (or last authorized rate of return, for any states in which GTE is no longer rate of return regulated), including rate of return for debt, equity and composite rates and the date on which that rate of return was authorized by that state's public service commission or other similar regulatory body.

Objection: GTEFL objects to the question because it seeks information that is irrelevant and it is not designed to lead to the discovery of any relevant information. Information for GTE companies other than GTEFL is not relevant to this Commission's determination of the appropriate terms of interconnection, unbundling, and resale as between GTEFL and AT&T. Information about rates of return is, likewise, irrelevant. This is not a rate case, GTEFL is not a rate-regulated carrier, and past rates of return have no bearing on any issue in this case.

- 37) Regarding the Florida unbundled loop cost study filed with the Florida Public Service Commission in conjunction with Docket No. 950984-TP:
- a. List all actual cable prices per "sheath foot" utilized by the Loop Investment Model and referenced in the first paragraph of Tab C of GTEFL's submission.

- b. Identify whether the material costs are the only costs included in the cable prices listed in (a) above.
- c. Identify and list all included 1995 directly assigned hourly labor rates and show direct salaries and each individual labor loading.
- d. Describe all algorithms or other calculations used by GTEFL to determine the forward looking technology break point for fiber vs. copper feeder (i.e., 12,000 feet).
- e. Describe in detail the "SONET" Fundamental Investment Model used in the Florida unbundled loop studies, including its methodology, model inputs and outputs, model default options, calculations and process steps.
- f. Describe in detail the Fundamental Digital loop Carrier Investment Model used in the Florida unbundled loop studies, including its methodology, model inputs and outputs, model default options, calculations and process steps.
- g. Describe in detail the Fundamental Multiplex Investment Model, including its methodology, model inputs and outputs, model default options, calculations and process steps.
- h. Describe the design of the sampling process used to collect the loop survey data, including (1) whether or not the data was collected in a manner which was representative of a composite of all loops or of only growth loops, (2) whether the sampling process was designed to be statistically valid for any subgroup of the total (e.g., business or residence), and (3) the number of loops samples by class of service.
- i. List sample circuit results for each sample referenced under Tab E.
- j. List and describe all calculations performed to complete average loop investments, by class of service and results by class of service.

Objection: GTEFL objects to this request because it seeks information that is irrelevant and it is not designed to lead to the discovery of relevant information. In addition, GTEFL objects this request because it is unduly burdensome to produce the requested material, particularly since it is not relevant to any issue in this case. Finally,

GTEFL objects on the ground that the information sought is confidential, proprietary, and competitively sensitive.

- 38) Explain how the investments, revenues and expenses associated with jointly used poles and conduits are reported in GTEFL's books. Explain how these investments, revenues and expenses, and resulting payments and receipts, are accounted for in the unbundled loop studies (I) presented to AT&T by GTEFL during negotiations; (ii) submitted by GTEFL to the Florida Public Service Commission in conjunction with Docket No. 950984-TP.

Objection: GTEFL objects to this request because it seeks information that is confidential, proprietary, and competitively sensitive. Notwithstanding this objection, GTEFL will respond with any relevant information under the terms of the appropriate protective agreement.

- 39) Compare the historical distribution to code for aerial, buried and underground pair feet to the sample distribution to code used in the studies described in Interrogatory No. 37.

Objection: GTEFL objects to this request because it seeks information that is confidential, proprietary, and competitively sensitive. Notwithstanding this objection, GTEFL will respond with any relevant information under the appropriate protective agreement.

- 40) Compare the historical cable sheath size by code to the average sheath size by code used in the studies described in Interrogatory No. 37.

Objection: GTEFL objects to this request because it seeks information that is confidential, proprietary, and competitively sensitive. Notwithstanding this objection, GTEFL will respond with any relevant information under the appropriate protective agreement.

- 41) Identify each serving end office and access tandem in GTEFL's territory. For each office and access tandem identified, provide the following information:
- a. Office name
 - b. CLLI Code
 - c. LATA
 - d. Switch Vendor
 - e. Office type
 - f. Host Office
 - g. Present Software Generic Version
 - h. Number of access lines served by the office
 - i. InterLATA Equal Access implementation date
 - j. IntraLATA Equal Access implementation date

Please provide the information of the same type and in the same format as shown in the sample form attached to this interrogatory.

Objection: GTEFL objects to this request because it seeks information that is confidential, proprietary, and competitively sensitive. Notwithstanding this objection, GTEFL will respond with any relevant information under the appropriate protective agreement.

- 43) For each switch type in GTEFL's territory, provide the average per switch usage of the switch resource used to retrieve routing information (for example, number of line class codes for the Lucent 5ESS, the number of line attributes for the Nortel switches, etc.).

Objection: GTEFL objects to this request because it seeks information that is confidential, proprietary, and competitively sensitive. Notwithstanding this objection, GTEFL will respond with any relevant information under the terms of the appropriate protective agreement.

- 44) On a per switch basis for each switch identified in Interrogatory No. 41 above, provide the average number of rate centers.

Objection: GTEFL objects to this request because it seeks information that is

confidential, proprietary, and competitively sensitive. Notwithstanding this objection, GTEFL will respond with any relevant information under the terms of the appropriate protective agreement.

- 45) For each end office and access tandem identified in Interrogatory No. 41, indicate any software or equipment upgrades that are planned through year end 1998.

Objection: GTEFL objects to this request because it seeks information that is confidential, proprietary, and competitively sensitive. GTEFL objects to this question on the additional ground that it is not relevant to determination of any issue in this case and it is not designed to lead to the discovery of any relevant information. GTEFL will supply to AT&T, on a request-specific basis, information that is legitimately necessary for it to interconnect with GTEFL and to obtain authorized, unbundled elements.

- 46) With respect to GTEFL's utilization of Digital Loop Carrier Systems (DLC) in its loops:
- a. What percent of loops are provided utilizing Digital Loop Carriers?
 - b. What type of Digital Loop Carrier Systems does GTEFL currently use and what are their capabilities to accommodate interconnection with AT&T? (Provide manufacturer and model number.)

Objection: GTEFL objects to this question because it seeks information that is confidential, proprietary, and competitively sensitive. Notwithstanding this objection, GTEFL will respond with any relevant information under the appropriate protective agreement.

- 50) On page NAR-1 (Avoided Cost Narrative) of the documentation, reference is made to a "managerial reporting process that reflects results as the business is managed as opposed to traditional account codes." In reference to this cite, provide the following:

- a. A description of how this reporting occurs (e.g., does each employee report all work to these codes on actual time basis, exception time basis, or any other basis, study, etc.) Please provide a detailed explanation.
- b. For each code provided in (b) above, provide a detailed narrative explanation of each such code/subcode.

Objection: GTEFL objects to this request because it seeks information that is irrelevant and it is not designed to lead to the discovery of relevant and admissible evidence. The question pertains to a specific GTE California cost study in a designated California docket. Only GTE Florida's cost studies are relevant to this proceeding to resolve arbitration issues between GTEFL and AT&T in Florida. GTEFL objects on the additional ground that it does not possess or control GTE California's cost studies. GTEFL cannot answer questions keyed to a study that it does not have and that does not pertain to GTEFL.

- 51) On page NAR-2 (Avoided Cost Narrative), it is stated that a work center was included if its contained any current retail cost that would not be present in a resale transaction. In general, customer oriented work centers in the retail lines of business (consumer and business) were identified as applicable and included in the analysis." With respect to this cite, provide the following:
- a. An explanation as to whether all customer-oriented work centers means that 100% of the work center was identified as avoided or whether other percentages were determined.
 - b. Were there some work centers that involve customer-oriented activities that were not included in the study? Please list these and explain why they were not included.

Objection: GTEFL objects to this request because it seeks information that is irrelevant and it is not designed to lead to the discovery of relevant and admissible evidence. The question pertains to a specific GTE California cost study in a designated California docket. Only GTE Florida's cost studies are relevant to this proceeding to resolve arbitration issues between GTEFL and AT&T in Florida. GTEFL objects on the

additional ground that it does not possess or control GTE California's cost studies. GTEFL cannot answer questions keyed to a study that it does not have and that does not pertain to GTEFL.

- 52) For each work center identified on Attachment II (Work Center Glossary), please provide the total costs attributed by USOA Part 32 account/subaccount for the period covered.

Objection: GTEFL objects to this request because it seeks information that is irrelevant and it is not designed to lead to the discovery of relevant and admissible evidence. The question pertains to a specific GTE California cost study in a designated California docket. Only GTE Florida's cost studies are relevant to this proceeding to resolve arbitration issues between GTEFL and AT&T in Florida. GTEFL objects on the additional ground that it does not possess or control GTE California's cost studies. GTEFL cannot answer questions keyed to a study that it does not have and that does not pertain to GTEFL.

- 53) Does GTEFL's avoided cost study reflect actual 1995 calendar results or is it based on partial year data annualized?

Objection: GTEFL objects to this request because it seeks information that is irrelevant and it is not designed to lead to the discovery of relevant and admissible evidence. The question pertains to a specific GTE California cost study in a designated California docket. Only GTE Florida's cost studies are relevant to this proceeding to resolve arbitration issues between GTEFL and AT&T in Florida. GTEFL objects on the additional ground that it does not possess or control GTE California's cost studies. GTEFL cannot answer questions keyed to a study that it does not have and that does not pertain to GTEFL.

- 54) Please reconcile the GTEFL national avoided cost study to the appropriate 1995 annual ARMIS reports by account or in total.

Objection: GTEFL objects to this request because it seeks information that is irrelevant and it is not designed to lead to the discovery of relevant and admissible evidence. The question pertains to a specific GTE California cost study in a designated

California docket. Only GTE Florida's cost studies are relevant to this proceeding to resolve arbitration issues between GTEFL and AT&T in Florida. GTEFL objects on the additional ground that it does not possess or control GTE California's cost studies. GTEFL cannot answer questions keyed to a study that it does not have and that does not pertain to GTEFL.

- 55) Does the GTEFL avoided cost study included all costs, revenues, and statistical data for its Contel operations? If not, why not?

Objection: GTEFL objects to this request because it seeks information that is irrelevant and it is not designed to lead to the discovery of relevant and admissible evidence. The question pertains to a specific GTE California cost study in a designated California docket. Only GTE Florida's cost studies are relevant to this proceeding to resolve arbitration issues between GTEFL and AT&T in Florida. GTEFL objects on the additional ground that it does not possess or control GTE California's cost studies. GTEFL cannot answer questions keyed to a study that it does not have and that does not pertain to GTEFL.

- 56) Regarding GTEFL ARMIS reports:

- a. Please provide a list of companies and study areas as filed on the GTEFL ARMIS reports, that when added together will be included in Attachment IV of the GTEFL avoided cost study.
- b. Are any dollars included in the revenues in Attachment IV not filed in an ARMIS report; for example, in a company not large enough to be required to file an ARMIS report?
- c. If the answer to question 56b is yes, please list these companies and study areas.

Objection: GTEFL objects to this request because it seeks information that is irrelevant and it is not designed to lead to the discovery of relevant and admissible evidence. The question pertains to a specific GTE California cost study in a designated California docket. Only GTE Florida's cost studies are relevant to this proceeding to resolve arbitration issues between GTEFL and AT&T in Florida. GTEFL objects on the

additional ground that it does not possess or control GTE California's cost studies. GTEFL cannot answer questions keyed to a study that it does not have and that does not pertain to GTEFL.

- 57) With respect to Attachment IV of the study, please identify the USOA account/accounts for each revenue product/service line item.

Objection: GTEFL objects to this request because it seeks information that is irrelevant and it is not designed to lead to the discovery of relevant and admissible evidence. The question pertains to a specific GTE California cost study in a designated California docket. Only GTE Florida's cost studies are relevant to this proceeding to resolve arbitration issues between GTEFL and AT&T in Florida. GTEFL objects on the additional ground that it does not possess or control GTE California's cost studies. GTEFL cannot answer questions keyed to a study that it does not have and that does not pertain to GTEFL.

- 58) On Attachment I of the study, with respect to column 1 (direct costs), what adjustment is implicit in the Network Operations-Work Equipment line that created the negative cost?

Objection: GTEFL objects to this request because it seeks information that is irrelevant and it is not designed to lead to the discovery of relevant and admissible evidence. The question pertains to a specific GTE California cost study in a designated California docket. Only GTE Florida's cost studies are relevant to this proceeding to resolve arbitration issues between GTEFL and AT&T in Florida. GTEFL objects on the additional ground that it does not possess or control GTE California's cost studies. GTEFL cannot answer questions keyed to a study that it does not have and that does not pertain to GTEFL.

- 59) On Attachment IV of the study, with respect to page 34 of 52:

a. Are the Local Usage Originating MOU's only from 1 MB and 1MR services?

- b. Do the Local Usage Originating MOU's include the monthly allowance minutes from the 1 MB and 1 MR services for which the customer is not charged?
- c. If the minutes include minutes for which customers are not charged, can these be separately identified?
- d. Please provide a listing by state or area where local usage is tarified by the minute and a listing of where it is tarified by the call.

Objection: GTEFL objects to this request because it seeks information that is irrelevant and it is not designed to lead to the discovery of relevant and admissible evidence. The question pertains to a specific GTE California cost study in a designated California docket. Only GTE Florida's cost studies are relevant to this proceeding to resolve arbitration issues between GTEFL and AT&T in Florida. GTEFL objects on the additional ground that it does not possess or control GTE California's cost studies. GTEFL cannot answer questions keyed to a study that it does not have and that does not pertain to GTEFL.

- 60) On Attachment V of the study, with respect to Consumer-Phone Marts center, please give all numerical components with a descriptor (as provided in Attachment VI) of the formulas for each column (1 through 12) used to derive the numbers.

Objection: GTEFL objects to this request because it seeks information that is irrelevant and it is not designed to lead to the discovery of relevant and admissible evidence. The question pertains to a specific GTE California cost study in a designated California docket. Only GTE Florida's cost studies are relevant to this proceeding to resolve arbitration issues between GTEFL and AT&T in Florida. GTEFL objects on the additional ground that it does not possess or control GTE California's cost studies. GTEFL cannot answer questions keyed to a study that it does not have and that does not pertain to GTEFL.

61) Regarding SUM-2 and SUM-3 of the study:

- a. Are the service rates average nationwide rates or state-specific?
- b. If they are state-specific, what state?
- c. Please provide the rate for 1 FB.

Objection: GTEFL objects to this request because it seeks information that is irrelevant and it is not designed to lead to the discovery of relevant and admissible evidence. The question pertains to a specific GTE California cost study in a designated California docket. Only GTE Florida's cost studies are relevant to this proceeding to resolve arbitration issues between GTEFL and AT&T in Florida. GTEFL objects on the additional ground that it does not possess or control GTE California's cost studies. GTEFL cannot answer questions keyed to a study that it does not have and that does not pertain to GTEFL.

62) Please provide 1995 GTEFL regulated non-recurring costs and revenues for Florida split between toll, local, access, and any other service category in which this data is maintained. (Specify the account number and descriptions included in each category).

Objection: GTEFL objects to this request because it seeks information that is irrelevant and it is not designed to lead to the discovery of any relevant evidence. GTEFL's revenues are irrelevant to the Commission's determination of the appropriate terms of interconnection, unbundling, and resale as between GTEFL and AT&T. GTEFL has provided relevant, service-specific cost data to AT&T under the parties' protective agreement in this docket. AT&T has no legitimate need for the cost breakdown by the categories it has listed in this question. GTEFL objects on the further ground that the information sought is confidential, proprietary, and competitively sensitive.

63) Can GTE calling cards be used to place local calls in Florida?

Objection: GTEFL objects to this request because it is irrelevant and not designed to lead to the production of any relevant evidence.

- 64) If the answer to Interrogatory 63 above is yes:
- a. Please provide the tariffed rate for the call.
 - b. Please provide the USOA account numbers to which the revenue and expenses associated with such a call are booked.
 - c. Please provide the totals by USOA account for these revenues and expenses in Florida for 1995.

Objection: GTEFL objects to this question because it seeks information that is not relevant and it is not designed to lead to the discovery of any relevant information.

- 65) Regarding the distribution of GTE calling cards:
- a. What is the criteria for mailing GTE calling cards to customers in the state of Florida?
 - b. Do all customers with local service receive calling cards?
 - c. Are calling cards only mailed due to customer request?
 - d. Please provide the USOA account numbers to which the expenses for printing, advertising, and distributing calling cards are booked.
 - e. Please provide the totals by USOA account for these expenses in Florida in 1995.

Objection: GTEFL objects to this question because it seeks information that is not relevant and it is not designed to lead to the discovery of relevant information.

- 68) For 1995, please provide the following:
- a. Billing insert expense booked in Florida by work center.
 - b. Billing insert expense booked in Florida by USOA account.

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Objection: GTEFL objects to this request because it is irrelevant and it is not designed to lead to the discovery of any relevant evidence.

Respectfully submitted on September 30, 1996.

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