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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: 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.)
_____)

Docket No. 960847-TP
Docket No. 960980-TP
Filed: September 30, 1996

**GTE FLORIDA INCORPORATED'S OBJECTIONS
TO AT&T'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
(NOS. 1 THROUGH 44)**

GTE Florida Incorporated (GTEFL) hereby files its objections to the following Request for Production of Documents 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) Produce all documents that evidence any communication of any kind between GTE and any other Local Exchange Company referring or relating in any way to AT&T's negotiations with GTE conducted pursuant to the Act. This request includes, but is not limited to, all documents evidencing positions to be taken by GTE in AT&T's negotiations with GTE conducted pursuant to the Act.

Objection: GTE Florida Incorporated (GTEFL) objects to this request because it seeks information that is irrelevant and it is not designed to lead to any relevant or otherwise admissible evidence. Statements about AT&T, if any, made in GTEFL's discussions or negotiations with other carriers are not germane to the Commission's determination of the terms of interconnection and resale as between GTEFL and AT&T. Agreements under the Act are filed with the Commission after they are executed. There is no legitimate reason for AT&T to know about confidential discussions--whether or not they concern AT&T--that may have occurred in the context of discussions concerning, or negotiations leading to, those agreements.

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- 2) Produce all documents referring or relating in any way to any existing local exchange carrier agreement that addresses direct routing, operator services, directory assistance or repair services.

Objection: GTEFL objects to this request because it seeks information that is confidential and proprietary to GTEFL. Notwithstanding this objection, GTEFL will produce any relevant documents under the appropriate protective agreement with AT&T.

- 3) Produce all documents referring or relating in any way to pre-ordering electronic interface for reservation of telephone numbers.

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

- 4) Produce all documents referring or relating in any way to the development of electronic interface for:
- a. address information and validation;
 - b. availability of physical facilities at an address; and
 - c. the determination of due dates and appointment scheduling for installation.

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

- 5) Produce all documents referring or relating in any way to the development of electronic interface to GTE application computer systems for manual order input.

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

- 6) Produce all documents referring or relating in any way to the development of an electronic interface to GTEFL application computer systems for automated order preparation.

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

- 7) Produce all documents referring or relating in any way to any Local Carrier Service Center order input method or procedure.

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

- 8) Produce all documents referring or relating in any way to any Business and Repair Center method or procedure for handling repair or maintenance calls for a local exchange carrier other than GTEFL.

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

- 9) Produce all documents referring or relating in any way to any of the following that GTE has not agreed to offer to AT&T for resale:

- a. any grandfathered or obsolete service;
- b. any Link-Up service;
- c. any Lifeline service;
- d. any N11 service;
- e. any 911 service;
- g. any special billing arrangement;
- h. any educational discount program;
- l. any Contract Service Arrangement;
- j. any promotional rate;

- k. any installment billing arrangement; and/or
- l. any CentraNet service.

Objection: GTEFL objects to this request because it is unduly broad, vague, burdensome and oppressive. Even just one of the categories listed--for example, CentraNet--would require production of thousands of documents under this sweeping request. As such, GTEFL objects to the request on the additional ground that it would have GTEFL produce volumes of information that is irrelevant. If GTEFL is to produce anything in response to this request, AT&T must narrow it to state more particularly how the documents sought should refer or relate to the items listed, and the specified reference or relationship must show some relevancy to the purpose of this docket. GTEFL also objects to this request to the extent it seeks production of information that is confidential and proprietary to GTEFL.

- 10) Produce all current TSLRIC studies and all equivalent cost studies pertaining to all retail services currently offered by GTE. If a TSLRIC cost study is not available for any retail service, produce the most current Long Run Incremental Cost (LRIC) study for such service.

Objection: GTEFL objects to this request because it seeks information that is not relevant and it is not designed to lead to the discovery of relevant information. TSLRIC cost studies are relevant to this proceeding only to the extent that they concern services GTEFL will not resell because they are priced below TSLRIC. In addition, GTEFL objects to this request because it is unduly burdensome to require the Company to produce TSLRIC studies for "all retail services," particularly because, as noted above, many of these studies would be irrelevant to any issue in this proceeding. Finally, GTEFL objects because its cost studies are confidential, proprietary to GTEFL and competitively sensitive. Notwithstanding these objections, GTEFL will produce any relevant information under the appropriate protective agreement.

- 11) Produce all cost studies conducted after January 1, 1992, including but not limited to embedded cost studies, that identify the "retail" or "wholesale" cost associated with providing any of the following services:
 - a. flat rate local service; business; residence;
 - b. message rate local service;

- c. custom calling services;
- d. PBX Trunk Service;
- e. remote call forwarding;
- f. direct inward dialing;
- g. Coin telephone lines;
- h. CentraNet/Centrex;
- i. basic interLATA toll service;
- j. extended area service;
- k. CLASS services;
- l. optional extended area services;
- m. hunting;
- n. touch tone;
- o. AIN services;
- p. BRI ISDN;
- q. PRI ISDN
- r. additional residence lines;
- s. Data transport access channel service; and
- t. any retail service that GTE does not plan to make available for resale.

The documents requested include all of the most current avoided cost studies or any study that would support the "wholesale" discount on local services resale and any studies supporting the GTEFL tariff filings providing for a 5% discount for resale of intraLATA services. The documents requested include, but are not limited to, all study summaries, workpapers, study inputs and supporting studies used to calculate each study input.

Objection: GTEFL objects to this request because it seeks information that is proprietary, confidential, and highly competitively sensitive. GTEFL also objects to the request to the extent that it seeks information that is irrelevant and not designed to lead to the discovery of relevant or otherwise admissible information. GTEFL will produce only current cost results, as only they are relevant to determining the terms and conditions for resale and unbundling of existing GTEFL features and services. Any production will be done pursuant to the terms of an appropriate protective agreement between GTEFL and AT&T.

- 12) Provide all TSLRIC studies of switched and non-switched (special) access service. If no TSLRIC studies are available, provide the information based on available

LRIC studies. This information should be provided separately for the following categories: (1) Local Switching, (2) Tandem Switching, (3) Information surcharge when applicable, (4) RIC, (5) DS1, and (6) DS3. DS1 and DS3 costs should be provided on a per termination basis and on a per mile basis.

Objection: GTEFL objects to this request because it seeks information that is proprietary, confidential, and competitively sensitive. GTEFL also objects to this request to the extent that it seeks superseded, rather than current, cost studies. Only GTEFL's existing cost studies are relevant to resolving the terms for resale and unbundling of GTEFL's existing features and services. Notwithstanding these objections, GTEFL will produce any relevant documents under the appropriate protective agreement.

- 13) Produce all studies conducted after January 1, 1992, referring or relating in any way to the TSLRIC of each of the following:
- a. network interface device;
 - b. loop distribution;
 - c. loop concentrator/multiplexer;
 - d. loop feeder;
 - e. loop combination;
 - f. local switching;
 - g. local operator services, including but not limited to call completion, busy line verification, emergency interrupt and intercept services;
 - h. local directory assistance;
 - i. common transport;
 - j. dedicated transport;
 - k. digital cross-connect systems;
 - l. data switching;
 - m. SS7 message transfer and connection control;
 - n. signaling link transport;
 - o. SCPs/databases;
 - p. tandem switching;
 - q. Advanced Intelligence Network (AIN);
 - r. pole attachment space;
 - s. conduit space;
 - t. STS-1 interoffice channel;
 - u. FlexServ;

- v. virtual collocation;
- w. physical collocation;
- x. "dark" fiber lease.

If no TSLRIC documents are available for any item listed above, produce all documents referring or relating in any way to its LRIC.

Objection: GTEFL objects to this request because it seeks information that is proprietary, confidential, and competitively sensitive. GTEFL also objects to this request to the extent that it seeks superseded, rather than current, cost studies. Only GTEFL's existing cost studies are relevant to resolving the terms for resale and unbundling of GTEFL's existing features and services. Notwithstanding these objections, GTEFL will produce any relevant documents under the appropriate protective agreement.

- 14) Produce all documents referring or relating in any way to any methodology or assumption used in any cost study requested in Document Request 10, 11, 12 and 13.

Objection: GTEFL objects to this request because it seeks information that is proprietary, confidential, and competitively sensitive. GTEFL also objects to this request to the extent that it seeks superseded, rather than current, cost studies. Only GTEFL's existing cost studies are relevant to resolving the terms for resale and unbundling of GTEFL's existing features and services. Notwithstanding these objections, GTEFL will produce any relevant documents under the appropriate protective agreement.

- 15) Produce all interconnection agreements between GTE and any other local exchange carrier (including any independent incumbent local exchange company) and between GTEFL and any GTEFL subsidiaries or affiliates not already provided in response to document request no. 2.

Objection: GTEFL objects to this request because it seeks information that is confidential and proprietary to GTEFL. Notwithstanding this objection, GTEFL will produce any relevant documents under the appropriate protective agreement with AT&T.

- 16) Produce all documents referring or relating in any way to any projection of revenues

for local services.

Objection: GTEFL objects to this request because it seeks irrelevant information and is not designed to lead to the discovery of any relevant or otherwise admissible information. There is no legitimate reason why AT&T would need information concerning GTEFL's revenue projections in this docket to determine interconnection and resale conditions as between GTEFL and AT&T. GTEFL objects to the request on the further ground that it seeks data that are highly proprietary and competitively sensitive. With these data, AT&T could devise competitive strategies against GTEFL, without the usual marketplace trial and error. GTEFL should not be forced to turn over to its competitors such sensitive data, particularly when it has no relevancy to the matters to be resolved in this docket.

17) Produce all non-recurring cost studies for port termination and unbundled loops.

Objection: GTEFL objects to this request because it seeks information that is proprietary, confidential, and competitively sensitive. GTEFL also objects to this request to the extent that it seeks superseded, rather than current, cost studies. Only GTEFL's existing cost studies are relevant to resolving the terms for resale and unbundling of GTEFL's existing features and services. Notwithstanding these objections, GTEFL will produce any relevant documents under the appropriate protective agreement.

18) Produce all cost studies referring or relating in any way to GTE's special access or private line services.

Objection: GTEFL objects to this request because it seeks information that is proprietary, confidential, and competitively sensitive. GTEFL also objects to this request to the extent that it seeks superseded, rather than current, cost studies. Only GTEFL's existing cost studies are relevant to resolving the terms for resale and unbundling of GTEFL's existing features and services. Notwithstanding these objections, GTEFL will produce any relevant documents under the appropriate protective agreement.

19) Produce all cost studies referring or relating in any way to GTE's costs of providing loops and transport services over SONET rings.

Objection: GTEFL objects to this request because it seeks information that is proprietary, confidential, and competitively sensitive. GTEFL also objects to this request to the extent that it seeks superseded, rather than current, cost studies. Only GTEFL's existing cost studies are relevant to resolving the terms for resale and unbundling of GTEFL's existing features and services. Notwithstanding these objections, GTEFL will produce any relevant documents under the appropriate protective agreement.

- 20) Produce all cost studies referring or relating in any way to GTE's costs of providing data switching services, including but not limited to circuit switched data services, ISDN packet switched services, frame relay and ATM.

Objection: GTEFL objects to this request because it seeks information that is proprietary, confidential, and competitively sensitive. GTEFL also objects to this request to the extent that it seeks superseded, rather than current, cost studies. Only GTEFL's existing cost studies are relevant to resolving the terms for resale and unbundling of GTEFL's existing features and services. Notwithstanding these objections, GTEFL will produce any relevant documents under the appropriate protective agreement.

- 21) Produce all documents referring or relating in any way to training for GTE personnel regarding communication with retail customers of any alternative local exchange carrier.

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

- 23) Produce the unbundled element cost studies submitted by GTE to the Florida Public Service Commission in conjunction with Docket No. 950984-TP. The documents requested include, but are not limited to, all attachments and exhibits, workpapers, supporting studies used to calculate each study input, all documentation of supporting related cost modeling systems, and all documentation of integrated digital loop carrier inputs equivalent to the non-integrated inputs included in study examples.

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

- 24) Produce all documents referring or relating in any way to the technical feasibility of unbundling any of the following:
- a. Network Interface Device ("NID")
 - b. Loop Distribution;
 - c. Loop Concentrator/Multiplexer;
 - d. Local Switching;
 - e. Operator Systems;
 - f. Dedicated Transport;
 - g. Common Transport;
 - h. Advance Intelligent Network (AIN); or
 - i. Loop Feeder

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

- 25) Produce all documents referring or relating in any way to any method, procedure or agreement between GTE and any other local exchange carrier (including but not limited to any independent telephone company) for the rating, handling, settlement or billing of:
- a. operator-handled calls billed as collect calls;
 - b. operator-handled calls billed to calling cards; and
 - c. operator-handled calls billed to third numbers.

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

- 26) Produce all documents referring or relating in any way to any GTE performance standard for ordering, provisioning, installation, maintenance, dispatch or disaster recovery.

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

- 27) Produce all documents referring or relating in any way to existing, proposed or potential "firewalls" or "partitions" within GTE's internal customer information database.

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

- 28) Produce all documents referring to or relating in any way to GTE's disaster recovery plans for work center, data center, facility and central office restoration.

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

- 31) Produce all documents, including but not limited to, any studies referring to relating in any way to the evaluation of electronic interfaces.

Objection: GTEFL objects to this request because it seeks information that is confidential and proprietary to GTEFL. Notwithstanding this objection, GTEFL will produce any relevant documents under the appropriate protective agreement with AT&T.

- 32) Produce all documents referring or relating in any way to any billing agreement with Information Service Providers (ISPs).

Objection: GTEFL objects to this request because it seeks information that is irrelevant and is not calculated to lead to the discovery of any relevant or otherwise admissible information. GTEFL's contracts for billing services provided to ISPs are not relevant to this Commission's determination of interconnection and resale terms as between GTEFL and AT&T.

- 34) Produce all documents, including but not limited to, any studies referring or relating in any way to the wholesale/resale market for telecommunications services.

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 evidence. While documentation on wholesale costs may be relevant to this docket, all documentation concerning the "wholesale/resale market" is not relevant. In addition, production of all documents concerning the wholesale/resale market would be unduly burdensome, and GTEFL objects on this ground as well. AT&T would have GTEFL produce potentially thousands of documents that have nothing to do with this docket. Finally, GTEFL objects to this request because it seeks information that is proprietary, confidential, and competitively sensitive. Notwithstanding these objections, GTEFL will produce relevant any documents under the appropriate protective agreement.

- 35) Produce all documents, including but not limited to, any studies referring or relating in any way to any cost that would be incurred by GTE for developing wholesale telecommunications operations.

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

- 36) Produce the most current study performed by or for GTE that identifies hourly engineering and labor rates (by function) used in the termination of non-recurring and recurring service costs. The documents requested include, but are not limited to, documents reflecting a rate breakdown for each function into various cost

components (e.g., direct labor, first line supervision and benefits).

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

- 37) Produce all studies performed by or for GTE after January 1, 1992, which identified the costs of providing local interconnection service, including transfer, transport and termination services.

Objection: GTEFL objects to this request because it seeks information that is proprietary, confidential, and competitively sensitive. GTEFL also objects to this request to the extent that it seeks superseded, rather than current, cost studies. Only GTEFL's existing cost studies are relevant to resolving the terms for resale and unbundling of GTEFL's existing features and services. Notwithstanding these objections, GTEFL will produce any relevant documents under the appropriate protective agreement.

- 38) Provide the cost studies, including all workpapers and study inputs, that relate to the Florida unbundled loop cost study filed with the Florida Public Service Commission in conjunction with Docket No. 950984-TP. The documents requested include, but are not limited to, all attachments and exhibits, workpapers, supporting studies used to calculate each study input, all documentation of supporting related cost modeling systems, and all documentation of integrated digital loop carrier inputs equivalent to the non-integrated inputs included in study examples.

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

- 39) Provide all workpapers, documents, input and summaries relating to the Florida unbundled port and local measured usage study, submitted to the Florida PSC in conjunction with Docket No. 950984-TP. The documents requested include, but are not limited to, all attachments and exhibits, workpapers, supporting studies used to calculate each study input, all documentation of supporting related cost modeling systems, and all documentation of integrated digital loop carrier inputs equivalent

to the non-integrated inputs included in study examples.

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

40) This request pertains to the GTE CALIFORNIA AVOIDED COST STUDY (the study) dated 4/30/96 which is associated with the resale of services identified in Docket 96-03-020. On page NAR-1 (Avoided Cost Narrative) of the documentation, reference is made to "the study utilized 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. All documents that touch upon, describe or otherwise address the referenced managerial reporting process.
- b. A list of all codes or subcodes to which employees report their time and a translation/mapping to the categories listed on Attachment II (Workcenter Glossary).

Objection: GTEFL objects to this request because it seeks information that is irrelevant and is not calculated to lead to the discovery of any relevant or otherwise admissible information. The question pertains to material associated with a California cost study related to services identified in a California docket. GTEFL has produced its avoided cost data relative to Florida. No California data is needed to resolve the issues identified in this Florida proceeding. In addition, GTEFL objects to this request because the material sought is not within its possession or control.

43) Regarding any avoided retail cost studies GTE has in its possession or may have produced:

- a. Please provide GTE's 1995 avoided cost study for Florida and any supporting workpapers. The documents requested include, but are not limited to, all calculations supporting the actual dollar values shown in the study and all documents reflecting the costs that will be avoided.

- b. Please provide the latest copy of GTE's 1995 National avoided costs study and any supporting workpapers. The documents requested include, but are not limited to, all calculations supporting the actual dollar values shown in the study and all documents reflecting the costs that will be avoided.

Objection: GTEFL objects to this request because it seeks information that is proprietary, confidential, and competitively sensitive. GTEFL also objects to the question to the extent it seeks superseded cost studies. GTEFL will produce only the current avoided cost study, as old studies are not relevant to determining the terms of resale, interconnection, and unbundling. Notwithstanding these objections, GTEFL will produce any relevant documents under the appropriate protective order.

Respectfully submitted on September 30, 1996.

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