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October 7, 1996

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

Docket No. 960847-TP and 960980-TP

Dear Mrs. Bayo:

Enclosed for filing in the above referenced docket are an original and fifteen (15) copies of AT&T's Responses, Objections, and Motion for Protective Order with Respect to GTE Florida, Incorporated's First Request for Production of Documents.

Copies of the foregoing are being served on all parties of record in accordance with the attached Certificate of Service.

Yours truly,

Tracy Hatch

- ACK
- AFA
- APP
- CAF
- CMU Chase
- CTR
- EAG
- LEG 1
- LIN 5
- OPC
- RCH
- SEC 1
- WAS
- OTH

Attachments
cc: Parties of Record

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DOCUMENT NUMBER-DATE
10708 OCT-7 96
EPSC-RECORDS/REPORTING

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition 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: October 7, 1996

AT&T'S RESPONSES, OBJECTIONS, AND MOTION FOR PROTECTIVE ORDER WITH RESPECT TO GTE FLORIDA, INCORPORATED'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

AT&T Communications of the Southern States, Inc. (hereinafter "AT&T"), pursuant to Rules 25-22.034 and 25-22.035, Florida Administrative Code and Rules 1.340 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following Responses, Objections, and Motion for Protective Order with respect to GTE Florida Incorporated's (hereinafter "GTE") First Request for Production of Documents to AT&T Communications of the Southern States, Inc., dated September 17, 1996.

AT&T is continuing its search for any documents that may be responsive to GTE's requests. AT&T has spoken with counsel for GTE. AT&T and GTE have agreed that AT&T will supply any further documents that it has in its possession to GTE by Wednesday, October 9, 1996.

OBJECTIONS AND MOTION FOR PROTECTIVE ORDER

Pursuant to the terms of Order No. PSC-96-1053-PCO-TP issued by the Florida Public Service Commission ("Commission") in the above-referenced docket on August 16, 1996, AT&T served its Objections to GTE's First Request for Production of Documents on September 27, 1996. A copy of such Objections is attached hereto and

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incorporated herein by specific reference thereto. AT&T's objections are submitted pursuant to the authority contained in Slatnick v. Leadership Housing Systems of Florida, Inc., 368 So.2d 79 (Fla. 3d DCA 1979). To the extent that a Motion for Protective Order is required, the objections attached hereto and incorporated herein by specific reference thereto are to be construed as a request for a protective order.

RESPONSES TO SPECIFIC REQUESTS

Subject to and without waiver of its General Objections, Specific Objections, or Motion for Protective Order, AT&T submits the following Responses to specific discovery requests of GTE.

REQUEST NO. 1:

Please provide copies of all AT&T press releases relating to the provisions of the Telecommunications Act of 1996.

RESPONSE:

AT&T objects to this request on the grounds that it is irrelevant, overly broad, unduly burdensome, and not calculated to lead to the discovery of admissible evidence. Further, press releases are public documents and can be obtained by GTE from public sources.

REQUEST NO. 2:

Please provide copies of all AT&T press releases over the last twelve months relating to the provision of local exchange service by AT&T, including, but not limited to, all estimates of AT&T's potential market share.

RESPONSE:

See response to Request No. 1.

REQUEST NO. 3:

Please provide copies of all promotional or marketing materials developed by or for AT&T regarding local exchange services.

RESPONSE:

AT&T objects to this request on the grounds that it is irrelevant, overly broad, unduly burdensome and not calculated to lead to the discovery of admissible evidence. AT&T further objects to this request on the grounds that it seeks highly confidential trade secret information that is of no relevance to this proceeding. AT&T's promotional or marketing materials that have been or are being developed by AT&T have no relevance to GTE's obligations under the Telecommunications Act of 1996 ("Act").

REQUEST NO. 4:

Please provide copies of all reports, studies, analyses, internal company documents, memoranda or materials relating to AT&T's current marketing plans for local exchange service.

RESPONSE:

See response to Request No. 3

REQUEST NO. 5:

Please provide copies of all documents discussing or relating to AT&T's strengths in the local exchange marketplace or AT&T's relative advantages over other actual or potential local exchange competitors.

RESPONSE:

See response to Request No. 3.

REQUEST NO. 6:

Please provide any engineering reports, studies, analyses, internal company documents, memoranda or materials relevant to AT&T's assessment of how or why AT&T's plans for interconnection with GTE's network are considered technically feasible.

RESPONSE:

The information and data requested has been produced to GTE in the testimony of AT&T Witness Ray Crafton, in the Exhibits attached to the testimony of Mr. Crafton, and during the course of negotiations with GTE.

REQUEST NO. 7:

To the extent AT&T has entered into arrangements with any incumbent local exchange carriers (ILECs) for interconnection that would require modifications to the ILEC 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.

RESPONSE:

AT&T has not entered into any arrangements with ILECs in Florida for interconnection under the Act. Therefore, there are no documents responsive to this request.

REQUEST NO. 8:

In addition to arrangements identified in response to item 7, above, to the extent AT&T 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.

RESPONSE:

In accordance with AT&T's Objections, AT&T objects to this request on the grounds that its negotiations and discussions with other carriers are irrelevant to this proceeding and are not, therefore, reasonably calculated to lead to the discovery of admissible evidence. AT&T also objects to this request to the extent it seeks to discover information which may be proprietary and confidential to other ILECs and which may be the subject of a protective agreement between the parties involved in negotiations. AT&T also objects to this request on the grounds that it is overly broad, unduly burdensome and oppressive.

Subject to and without waiver of the above objections, AT&T provides the following response to this request. AT&T and BellSouth are parties to an arbitration proceeding before this Commission, Docket No. 960833-TP. To the extent there were any discussions or negotiations between AT&T and BellSouth which are relevant to GTE's

request, such documents are publicly filed with the Florida Commission. AT&T should not be required to reproduce those voluminous documents for GTE when they are easily obtainable by GTE

REQUEST NO. 9:

If AT&T 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.

RESPONSE:

See response to Request No. 7.

REQUEST NO. 10

If AT&T 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.

RESPONSE:

See response to Request No. 7.

REQUEST NO. 11:

If AT&T 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.

RESPONSE:

See response to Request No. 8

REQUEST NO. 12:

Please provide all cost studies written or prepared by or for AT&T which identify AT&T's Total Service Long Run Incremental Cost (TSLRIC) or Total Element Long Run Incremental Costs (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, back-up data, data inputs, documentation of mapping of inputs to the methodology used, detailed outputs, factors, assumptions, algorithms and weightings.

RESPONSE:

In accordance with AT&T's Objections, AT&T objects to this request on the grounds that it is irrelevant, overly broad, unduly burdensome, and not calculated to lead to the discovery of admissible evidence. AT&T further objects to this request on the grounds that it seeks highly confidential trade secret information that is of no relevance to this proceeding. To the extent GTE's request seeks information pertaining to AT&T's obligations and practices as an interexchange carrier in the highly competitive interexchange market, such information is irrelevant to GTE's duties and obligations under the federal act, the FCC's Order, and Florida law as a monopolist, incumbent local exchange carrier in the local exchange market.

REQUEST NO. 13:

If AT&T 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.

RESPONSE:

AT&T objects to this Request to the extent it seeks information pertaining to AT&T's operations outside the State of Florida and AT&T's operations as an IXC. Subject to and without waiver of the above objections and the Objections served on GTE on September 27, 1996, AT&T will produce those documents responsive to GTE's request.

REQUEST NO. 14:

In addition to any arrangements identified in response to item 13, above, if AT&T 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 arrangements.

RESPONSE:

See Response to Request No. 8.

REQUEST NO. 15:

If AT&T 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.

RESPONSE:

All such arrangements are detailed in the tariffs of ILECs which are on file with the Florida Public Service Commission and are available to GTE.

REQUEST NO. 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.

RESPONSE:

See Response to Request No. 15.

REQUEST NO. 17:

In addition to any agreements, internal company memoranda, materials and other associated documents produced in response to item 15, if AT&T 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.

RESPONSE:

See Response to Request No. 8.

REQUEST NO 18:

Please provide any engineering reports, studies, analyses, internal company documents, memoranda or materials supporting AT&T's assessment of how or why AT&T'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.

RESPONSE:

AT&T objects to this request on the ground that it is relevant, unduly burdensome, oppressive and not likely to lead to the discovery of admissible evidence. The Telecommunications Act of 1996 imposes no obligation on non-incumbent LECs to provide access to unbundled network elements.

REQUEST NO. 19:

To the extent AT&T has entered into arrangements with any ILECs for unbundling of network elements that would require modifications to the ILECs 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.

RESPONSE:

AT&T has not entered into any arrangements with ILECs in Florida for unbundling of network elements under the Act.

REQUEST NO. 20:

In addition to any arrangements identified in response to item no. 19, above, has AT&T 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.

RESPONSE:

See Response to Request No. 8.

REQUEST NO. 21:

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

RESPONSE:

AT&T has no documents specifically analyzing the cost of purchasing services through unbundling as opposed to purchasing services through resale in Florida.

REQUEST NO. 22:

If AT&T currently offers any telecommunications services for resale, please provide all reports, studies, analyses, internal company documents, memoranda, or materials providing support for AT&T's pricing of such services.

RESPONSE:

See Response to Request No. 12.

REQUEST NO. 23:

If there are circumstances under which AT&T would discount the price for telecommunications services at a) retail and b) wholesale, please provide all reports, studies, analyses, internal company documents, memoranda or materials relating to the application of such discounts.

RESPONSE:

See response to Request No. 22.

REQUEST NO. 24:

Please provide all reports, studies, analyses, internal company documents, memoranda or materials supporting AT&T's plans for physical or virtual collocation of equipment on GTE's premises.

RESPONSE:

AT&T has provided GTE with all documents that are responsive to this request. AT&T should not be required to reproduce documents which AT&T has previously provided to GTE. Specifically, in August 1996 AT&T provided GTE with its application for collocation and with Access Service Requests (ASRs) which detailed AT&T's plans for collocation, including the identification of those premises at which AT&T wishes to collocate and the equipment AT&T wishes to collocate. Receipt of those requests were acknowledged on August 29, 1996 by Ms. Joan Sykes of GTE.

REQUEST NO. 25:

If AT&T 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.

RESPONSE:

AT&T has not entered into any arrangement with ILECs in Florida for physical or virtual collocation under Section 251 or 252 of the Act.

REQUEST NO. 26:

In addition to any arrangements identified in response to item 25, above, if AT&T has engaged in any discussion with ILECs regarding physical or virtual collocation, please provide any reports, studies, analyses, internal company documents, memoranda or materials relating to such discussions.

RESPONSE:

See Response to Request No. 8.

REQUEST NO. 27:

If AT&T 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.

RESPONSE:

AT&T has not entered into any arrangement with ILECs in Florida for interim or permanent number portability under Section 251 or 252 of the Act. The Florida Commission, however, approved an interim number portability solution in Docket No. 950737-TP and is investigating a permanent solution in Docket No. 960100-TP.

REQUEST NO. 28:

In addition to any arrangements identified in response to item 27, above, if AT&T 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.

RESPONSE:

See Response to Request No. 8.

REQUEST NO. 29:

Please provide any reports, studies, analyses, internal company documents, memoranda or materials written or prepared by or for AT&T 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.

RESPONSE:

Documents responsive to this request have been filed with the Florida Public Service Commission. The data requested in this Request are in Mr. Crafton's testimony, deposition, and the late-filed exhibits to Mr. Crafton's testimony. The information is

available to GTE. AT&T will produce all other documents, if any, that are responsive to this request.

REQUEST NO. 30:

Please provide any reports, studies, analyses, internal company documents, memoranda or materials written or prepared by or for AT&T 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.

RESPONSE:

See response to Request No. 29.

REQUEST NO. 31:

Please provide any reports, studies, analyses, internal company documents, memoranda or materials written or prepared by or for AT&T 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 RCF or Flex-DID as a method for interim number portability.

RESPONSE:

See response to Request No. 29.

REQUEST NO. 32:

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

RESPONSE:

See Response to Request No. 27

REQUEST NO. 33:

Please provide any engineering reports, studies, analyses, internal company documents, memoranda or materials relevant to AT&T's assessments of how or why its plans for interconnection with GTE's network would be technically feasible.

RESPONSE:

AT&T will produce those documents, if any, responsive to this request.

REQUEST NO. 34:

Please provide copies of any agreements, internal company memoranda, materials or other associated documents relating to arrangements between AT&T 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.

RESPONSE:

AT&T has not entered into any arrangement with ILECs in Florida for the provision of the above services under Section 251 or 252 of the Act.

REQUEST NO 35:

In addition to any arrangements identified in response to item 32, above, if AT&T 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.

RESPONSE:

See response to Request No. 8.

REQUEST NO. 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 AT&T for access to operations support systems of other telecommunications carriers.

RESPONSE:

AT&T's proposed Interconnection Agreement, the testimony of AT&T witness Shurter, and the relevant documentation including AT&T's detailed requirements for electronic interfaces filed in this proceeding are the documents which AT&T has that are responsive to this request. To the extent AT&T uncovers other documents that are responsive to this request, AT&T will produce those documents to counsel for GTE as provided for herein.

REQUEST NO. 37:

Please provide those agreements, internal company memoranda, materials and other associated documents entered into by AT&T with ILECs for interconnection, unbundling, or resale of local services which include performance standards and remedies for failure to meet such performance standards.

RESPONSE:

AT&T has not entered into any arrangements inquired of in this request with ILECs in Florida under Section 251 or 252 of the Act.

REQUEST NO. 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 AT&T to be charged for a failure to meet performance standards.

RESPONSE:

See Response to Request No. 37

REQUEST NO. 39:

In addition to any documents provided in response to item 37, above, if AT&T has engaged in any discussions with ILECs regarding remedies for failure to meet performance standards, please provide copies of any reports, studies, analyses, internal company documents, memoranda or materials relating to such discussions.

RESPONSE:

See Response to Request No. 8

REQUEST NO. 40:

If AT&T has any arrangements with any ILECs for 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.

RESPONSE:

AT&T has not entered into any arrangements inquired of in this request with ILECs in Florida under Section 251 or 252 of the Act.

REQUEST NO. 41:

In addition to any arrangements identified in response to item 40, above, if AT&T 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.

RESPONSE:

See Response to Request No. 8

REQUEST NO. 42:

Please provide all versions of the Hatfield Study written or prepared by or for AT&T, including all reports, studies, analyses, internal company documents, memoranda or materials written or prepared by or for AT&T relating to such study.

RESPONSE:

The testimony and exhibits of AT&T witness Don Wood, as well as the AT&T responses to the Staff's First Request for Production of Documents and First Set of Interrogatories respond to the above question in detail. Copies of the AT&T responses to the Staff's

First Request for Production of Documents is provided in response to Interrogatory No. 52.

To the extent there are other documents responsive to this request, AT&T will make such documents available to counsel for GTE upon the execution of an appropriate protective agreement.

REQUEST NO. 43:

Please provide those agreements, internal company memoranda, materials and other associated documents entered into by AT&T 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.

RESPONSE:

AT&T has not entered into any arrangements inquired of in this request with ILECs in Florida under Section 251 or 252 of the Act.

REQUEST No. 44:

Please provide the most recent cost studies prepared by or for AT&T 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.

RESPONSE:

The testimony and exhibits of AT&T witnesses Lerma, Guedel, and Wood filed in this proceeding are responsive to this request.

To the extent there are other documents responsive to this request, AT&T will make such documents available to counsel for GTE upon the execution of an appropriate protective agreement.

REQUEST NO. 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 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.

RESPONSE:

See Response to Request No. 44. Specifically, the testimony and exhibits of AT&T witness Lerma submitted in this proceeding respond to the question.

REQUEST NO. 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 AT&T in connection with negotiations between AT&T and GTE or between AT&T and any ILEC.

RESPONSE:

See Response to Request No. 44.

REQUEST NO. 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.

RESPONSE:

See Response to Request 44.

REQUEST NO. 48:

Please provide all reports, studies, analyses, internal company documents, memoranda or materials written or prepared by or for AT&T of any cost savings AT&T 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 AT&T's rates for service other than local exchange service, including, but not limited to, interLATA or long distance service.

RESPONSE:

AT&T objects to this request on the grounds that to the extent GTE is seeking information other than the local exchange market, it is irrelevant and not calculated to lead to the discovery of admissible evidence. AT&T also objects on the ground of confidentiality because the request seeks highly proprietary competitive information not relevant to this proceeding and that constitutes "trade secrets" under Florida law.

REQUEST NO. 49:

Please provide all reports, studies, analyses, internal company documents, memoranda or materials written or prepared by or for AT&T identifying potential savings to AT&T of access charges as a result of entering local exchange service through interconnection with and unbundling and resale of ILEC network elements and services.

RESPONSE:

See request to Request No. 48.

REQUEST NO. 50:

Please provide the most recent cost studies prepared by or for AT&T 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 Cost (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.

RESPONSE:

See response to Request No. 48 to the extent GTE seeks information related to AT&T. If GTE is seeking documents related to ILECs, AT&T has filed with the Commission and GTE in this proceeding and with the Commission and the parties of record in Docket No. 960833-TP all documents related to the costs AT&T believes ILECs will incur or avoid under the Telecommunications Act of 1996.

REQUEST NO. 51:

With regard to factors and inputs used 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.

RESPONSE:

See response to Request No. 50.

REQUEST NO. 52:

Please provide copies of all documents AT&T produced to the Florida Public Service Commission Staff in response to Staff's First Request for Production of Documents in this docket.

RESPONSE:

AT&T will produce those documents, if any, that are responsive to this request.

Respectfully submitted this 7th day of October, 1996.



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SOUTHERN STATES, INC.

CERTIFICATE OF SERVICE

DOCKET NOS. 960847-TP and 960980-TP

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand-delivery to the following parties of record this 7th day of October, 1996:


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