



GTE SERVICE CORPORATION

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December 29, 1997

Tracy Hatch, Esq.
AT&T Communications of the
Southern States, Inc.
101 North Monroe Street, Suite 700
Tallahassee, FL 32301

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 Tracy:

In accordance with customary Commission procedure, these are GTE Florida Incorporated's preliminary objections to AT&T's Second Request for Production of Documents and AT&T's Third Set of Interrogatories, both filed on December 18, 1997. GTEFL will file more complete objections with its responses to AT&T's discovery. GTEFL also reserves the right to make different and/or additional objections at that time.

GTEFL intends to object to Interrogatory numbers 77, 80-82, 84-86, and 91 because they are, at least to some extent, irrelevant to any issue in this proceeding. GTEFL will additionally object to questions 84-86 to the extent that answering them in the manner requested would be unduly burdensome and oppressive for GTEFL.

A part of GTE Corporation

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

DOCUMENT NUMBER-DATE

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Tracy Hatch, Esq.
December 29, 1997
Page 2

With regard to AT&T's Request for Production of Documents, GTEFL intends to object to items 45 and 47-51 to the extent that they seek information irrelevant to this proceeding. GTEFL will additionally object to item 47 because it would be unduly burdensome and oppressive for GTEFL to produce information which is already publicly available to AT&T.

Finally, GTEFL objects to AT&T's designation of the Commission's Order number PSC-96-1053-PCO-TP as controlling procedure in this case. GTEFL understands the Commission will issue a different procedural order to govern procedure for this phase of this docket. Because the relevant order has not yet been issued, GTEFL will respond to AT&T's discovery under the time frames reflected in the Florida Rule of Civil Procedure 1.340, in accordance with customary Commission practice.

If you have any questions, please contact me at (813) 483-2617.

Very truly yours,

Kimberly Caswell

Kimberly Caswell

KC:tas

c: Blanca S. Bayo
Staff Counsel

Airborne