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August 4, 1998

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

Re: Docket No. 980696-TP
Determination of the cost of basic local telecommunications service,
pursuant to Section 364.025, Florida Statutes

Dear Ms. Bayo:

Please find enclosed for filing an original and fifteen copies of GTE Florida Incorporated's Objections to Florida Cable Telecommunications Association's First Set of Interrogatories in the above matter. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact

ACK me at (813) 483-2617.

AFA 2

APP Very truly yours,

CAE Ernesto Mayor Jr. for
CMU [Signature]

CTR Kimberly Caswell

EAG KC:tas

LEG 2 Enclosures

LIN 5

OPC _____

RCH _____

SEC 1
A part of GTE Corporation

WAS _____

OTH _____

RECEIVED & FILED

[Signature]
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

08220 AUG-4 98

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the cost of providing) Docket No. 980696-TL
basic local telecommunications service,)
pursuant to Section 364.025, Florida Statutes) Filed: August 4, 1998
_____)

**GTE FLORIDA INCORPORATED'S OBJECTIONS TO
FLORIDA CABLE TELECOMMUNICATIONS ASSOCIATION'S
FIRST SET OF INTERROGATORIES**

GTE Florida Incorporated ("GTEFL") hereby files its objections to the First Set of Interrogatories served upon it by the Florida Cable Telecommunications Association ("FCTA"). These objections are preliminary in nature, and GTEFL reserves the right to make additional and/or more complete objections at the time its responses are served.

GENERAL OBJECTIONS

Each of the general objections set forth below is incorporated into each of the specific responses and objections.

1. GTEFL objects to FCTA's definition of "GTE," to the extent that definition includes GTEFL's "parents, subsidiaries, and affiliates" and any other entities that are not GTEFL. The purpose of this proceeding, as set forth in the Florida Statutes, is to choose a proxy model to determine the forward-looking cost of basic local telecommunications service. Only GTEFL's costs and associated information are relevant to this purpose. GTEFL will respond to FCTA's discovery only on behalf of GTEFL.
2. GTEFL objects to FCTA's First Set of Interrogatories to the extent that it seeks information which is obtainable from some other source that is more convenient, less burdensome, or less expensive.
3. GTEFL objects to FCTA's First Set of Interrogatories to the extent that it seeks the identification of documents or portions of documents protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or immunity. The inadvertent production of any privileged document shall not be deemed to be a waiver of any applicable privilege with respect to such document or to the subject matter of the document. GTEFL specifically reserves the right to demand the return of any such privileged documents, without prejudice to any claim of privilege, in the event any such document is inadvertently produced.

4. The agreement to produce documents in lieu of identifying them in response to a particular interrogatory request shall not be interpreted to mean that responsive documents exist. In addition, all documents produced are subject to all objections as to authenticity, relevance, and admissibility, and to any other appropriate objections.
5. Each of GTEFL's responses to the individual interrogatories will be made subject to, qualified by, and made without waiver of each of the foregoing general objections.

INTERROGATORIES

- 1) Please provide a detailed explanation of each difference between the ICM Version 2.12 and ICM Version 3.0. On an isolated basis, or for each change and/or difference in the models:
 - a) include the estimated dollar impact; and
 - b) identify whether the results were obtained from test data or actual state operating data.

OBJECTION:

GTEFL objects to FCTA's Interrogatory 1 on the grounds that it does not seek any information that is relevant to this docket, nor is it calculated to lead to the discovery of any relevant and otherwise admissible information since ICM has not been filed in this docket. GTEFL further objects to this request on the grounds it is overbroad and unduly burdensome.

- 2) Please provide the estimate of your cost of supported universal services, by wire center and on a statewide basis, for the State of Florida as determined by ICM Version 2.1 2 and ICM Version 3.0. If GTE has not conducted Florida-specific runs under both versions of the ICM, please provide the requested data based upon whatever comparison runs that have been conducted.

OBJECTION:

GTEFL objects to FCTA's Interrogatory 2 on the grounds that it does not seek any information that is relevant to this docket, nor is it calculated to lead to the discovery

of any relevant and otherwise admissible information since ICM has not been filed in this docket. GTEFL further objects to this request on the grounds it is overbroad and unduly burdensome.

- 3) Please provide your forward-looking investment and expense amounts generated under the ICM Version 3.0 for the State of Florida by Part 32 subsidiary account (e.g., Account 2111 through Account 2441 and Account 6112 through Account 6728). If the model output is not available by Part 32 subsidiary account basis, provide the investment and expense amounts generated under the ICM Version 3.0 for the State of Florida by major category of investment and operating expense (e.g., General Support Assets, Central Office Switching, Central Office Transmission, Information Origination/Termination Equipment, Cable and Wire Facilities, Plant Specific Operations Expenses, Plant Non-Specific Operations Expenses, Customer Services Operations Expenses, and General and Administrative Expenses).

OBJECTION:

GTEFL objects to FCTA's Interrogatory 3 on the grounds that it does not seek any information relevant to this docket, nor is it calculated to lead to the discovery of any relevant and otherwise admissible information since ICM has not been filed in this docket. GTEFL further objects to this request on the grounds it is overbroad and unduly burdensome.

- 4) Please provide the number of your access lines, disaggregated by the lowest level of identity maintained by GTE, by wire center and on a total state basis for the State of Florida for the years 1995, 1996, and 1997. Indicate the source of the access line data.

OBJECTION:

GTEFL objects to FCTA's Interrogatory 4 on the grounds that the information it seeks is confidential and highly sensitive competitive data.

Subject to and without waiver of GTEFL's general and specific objections, GTEFL will produce the requested information at the appropriate time following FCTA's execution of the enclosed protective agreement.

- 5) Please provide the number of your access lines, disaggregated by the lowest level of identify input into the ICM Version 3.0, by wire center and on a total state basis for the State of Florida in the determination of the estimate of the cost to provide supported universal services. Indicate the source of the access line data.

OBJECTION:

GTEFL objects to FCTA's Interrogatory 5 on the grounds that it does not seek any information that is relevant to this docket, nor is it calculated to lead to the discovery of any relevant and otherwise admissible information since ICM has not been filed in this docket. GTE further objects to this request on the grounds it is overbroad and unduly burdensome.

- 6) Please provide an explanation of GTE's accounting treatment for the rental of infrastructure (including but not limited to poles, trenches, conduit, etc.) to third parties and affiliates. If the rental fees are classified to an operating revenue account, identify the Part 32 account used to record the rental fees and the rental revenue realized during the years 1995, 1996, and 1997.

OBJECTION:

To the extent that FCTA's Interrogatory 6 seeks information about ICM inputs, GTEFL objects to the request on the grounds that it does not seek any information relevant to this docket, nor is it calculated to lead to the discovery of any relevant and otherwise admissible information since ICM has not been filed in this docket. Moreover, historical rental fees from 1995 and 1996 are not relevant to the choice of a forward-looking cost model, as required by section 364.025(4)(b), Florida Statutes.

- 7) Provide a detailed explanation of the methodology used to develop the rental fees charged by GTE to third parties and affiliates for the use of its infrastructure (including but not limited to poles, conduit, etc.).

OBJECTION:

To the extent FCTA's Interrogatory 7 seeks information specific to the development of ICM inputs, GTEFL objects to the request on the grounds that it does not seek any information that is relevant to this docket, nor is it calculated to lead to the

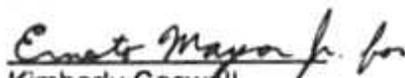
GTE Florida's Objections to
FCTA's 1st Set of Interrogatories
Page 5

discovery of any relevant and otherwise information since ICM has not been filed in this docket.

Subject to and without waiver of GTEFL's general and specific objections, GTEFL will respond to this Interrogatory in a general sense (i.e., not specific to any particular cost model) at the appropriate time.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Objections to Florida Cable Telecommunications Association's First Set of Interrogatories in Docket No. 980696-TP were sent via U.S. mail on August 4, 1998 to the parties on the attached list.


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