



ORIGINAL

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August 10, 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 AT&T's Second 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 me at (813) 483-2617.

Very truly yours,

RECEIVED & FILED

Ernesto Mayor Jr for

FPSC BUREAU OF RECORDS

Kimberly Caswell

KC:tas

Enclosures

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DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the cost of providing)
basic local telecommunications service,)
pursuant to Section 364.025, Florida Statutes)
_____)

Docket No. 980696-TP
Filed: August 10, 1998

**GTE FLORIDA INCORPORATED'S OBJECTIONS TO
AT&T'S SECOND SET OF INTERROGATORIES (37-53)**

GTE Florida Incorporated (GTEFL) hereby files its objections to AT&T's Second Set of Interrogatories. These objections are preliminary in nature and GTEFL reserves the right to make additional or more complete objections at the time it files its responses.

GENERAL OBJECTIONS

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

1. GTE Florida Incorporated (GTEFL) objects to AT&T's definition of "GTE" to the extent it includes GTEFL's "affiliates," "parents," "subsidiaries," "agents," "representatives," and all other entities that are not GTEFL. The purpose of this proceeding, as set forth in Florida Statutes section 364.025(4)(b), 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 thus respond to AT&T's discovery only on behalf of GTEFL.
2. GTEFL objects to AT&T's discovery 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 AT&T's discovery 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.

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FPSC-RECORDS/REPORTING

4. GTEFL's later responses to AT&T's Interrogatories will be made subject to, qualified by, and made without waiver of each of the foregoing general objections.

SPECIFIC OBJECTIONS

- 37) Please provide the percentage of customers who are assigned by GTE's ICM to the actual wire center from which they are served.

OBJECTION:

GTEFL objects to this interrogatory because it does not seek any relevant information, nor is it calculated to lead to the discovery of any relevant and otherwise admissible information. GTEFL has not filed ICM in this docket. Therefore, there is no reason for AT&T to ask questions about it.

- 38) With regard to cross-connect jumpers, please describe the sequence of operations involved in a contractor running a cross-connect jumper (i.e., Unit S20A) and state the time required for each function. Identify the number of jumpers a contractor typically runs per site visit.

OBJECTION:

GTEFL objects to this interrogatory because it does not seek any relevant information, nor is it calculated to lead to the discovery of any relevant and otherwise admissible information.

- 39) Regarding streets and roads, please describe all of the types of roads/streets from the TIGER files that are included and excluded in the road length calculations for each grid. Describe how the road lengths at intersections are counted by the ICM.

OBJECTION:

GTEFL objects to this interrogatory because it does not seek any relevant information, nor is it calculated to lead to the discovery of any relevant and otherwise admissible information. GTEFL has not filed ICM in this docket. Therefore, there is no reason for AT&T to ask questions about it.

- 40) Please describe the operations involved in the installation of a MDF protector.

OBJECTION:

GTEFL objects to this interrogatory because it does not seek any relevant information, nor is it calculated to lead to the discovery of any relevant and otherwise admissible information.

- 41) With regard to underground distribution cables, please provide whether ICM underground distribution cables actually serve customers in the grid cable section for which they are modeled. If so, please explain how drops connect to underground distribution cables. If not, please explain how customers in that grid section are served by drops.

OBJECTION:

GTEFL objects to this interrogatory because it does not seek any relevant information, nor is it calculated to lead to the discovery of any relevant and otherwise admissible information. GTEFL has not filed ICM in this docket. Therefore, there is no reason for AT&T to ask questions about it.

- 42) Regarding parallel grid cable sections:

- (a) As modeled by the ICM, are grid cable sections in parallel (e.g., two or more cables along the same street segment)?
- (b) If the answer to (a) is yes, are parallel grid cable sections the same type of structure? (e.g. buried, underground or aerial)
- (c) Do parallel grid cable sections share the same structure?
- (d) If the answer to (c) is no, please explain the structure modeling assumptions regarding parallel grid cable sections.

OBJECTION:

GTEFL objects to this interrogatory because it does not seek any relevant information, nor is it calculated to lead to the discovery of any relevant and otherwise admissible information. GTEFL has not filed ICM in this docket. Therefore, there is no reason for AT&T to ask questions about it.

43) In regards to poles and manholes:

- (a) As modeled by the ICM, is it correct that the number of poles and manholes required in a grid cable section is determined for each grid cable section with a pole or manhole at the beginning and end of each grid cable section?
- (b) If the answer to (a) is no, please describe the modeling methodology for determining the number of poles and manholes.
- (c) If answer to (a) is yes, please explain the apparent double counting of the pole or manhole at the end of one grid cable section with the pole or manhole at the beginning of the next grid cable section.

OBJECTION:

GTEFL objects to this interrogatory because it does not seek any relevant information, nor is it calculated to lead to the discovery of any relevant and otherwise admissible information. GTEFL has not filed ICM in this docket. Therefore, there is no reason for AT&T to ask questions about it.

44) As modeled by the ICM, are real estate lots square in shape and of equal size in a grid? Please explain the ICM's assumptions as to the size and shape of real estate lots in a grid.

OBJECTION:

GTEFL objects to this interrogatory because it does not seek any relevant information, nor is it calculated to lead to the discovery of any relevant and otherwise admissible information. GTEFL has not filed ICM in this docket. Therefore, there is no reason for AT&T to ask questions about it.

45) In regards to distribution cable structure selection:

- (a) Is it correct that the ICM has a modeling assumption that is biased towards "out-of-site" distribution plant (i.e., a preference for buried and underground plant versus aerial plant)?
- (b) Please describe and explain the ICM assumptions regarding the mix of distribution cable plant structure.
- (c) If the answer to (a) is yes, then please explain why.
- (d) Is it correct that aerial plant is less costly to install than buried and

underground plant?

- (e) If the answer to (d) is no, please explain why.
- (f) If the answers to (a) and (d) are both yes, explain how the ICM modeling bias toward buried and underground distribution plant comports with FCC Criterion No. 1 for the model to be least cost.

OBJECTION:

GTEFL objects to this interrogatory because it does not seek any relevant information, nor is it calculated to lead to the discovery of any relevant and otherwise admissible information. GTEFL has not filed ICM in this docket. Therefore, there is no reason for AT&T to ask questions about it.

- 46) In regards to the relationship between road footage and distribution cable footage:
- (a) Is it correct that, with the exception of Grid Style 3 (in ICM 2.X), the total cable footage in each grid style layout exceeds the road footage?
 - (b) If the answer to (a) is no, please explain.
 - (c) If the answer to (a) is yes, please explain how this comports with the basic ICM assumption that road footage equals cable footage.
 - (d) Is it correct that the distribution cable footage to serve the grid is limited to the road footage?
 - (e) If the answer to (d) is no, please explain.
 - (f) If the answers to both (a) and (d) are yes, is it correct that the ICM, with the exception of Grid Style 3, models insufficient cable footage to serve the grid segments depicted?
 - (g) If the answer to (f) is no, please explain why.

OBJECTION:

GTEFL objects to this interrogatory because it does not seek any relevant information, nor is it calculated to lead to the discovery of any relevant and otherwise admissible information. GTEFL has not filed ICM in this docket. Therefore, there is no reason for AT&T to ask questions about it.

- 47) Describe the relationship between GTE's current actual percentage mix (i.e., aerial, buried and underground) for distribution plant in Florida and the percentage mix resulting from running the ICM.

OBJECTION:

GTEFL objects to this interrogatory because it does not seek any relevant information, nor is it calculated to lead to the discovery of any relevant and otherwise admissible information. GTEFL has not filed ICM in this docket. Therefore, there is no reason for AT&T to ask questions about it.

- 48) In regards to the ICM modeling assumption that all copper feeder cable, regardless of pair size, is underground plant in the 16-grid area around the wire center:
- (a) Is it correct that aerial plant is less costly than underground plant, particularly when the much greater sharing percentage of aerial plant is factored into the costs?
 - (b) If the answer to (a) is no, please explain why underground plant is less costly than aerial plant.
 - (c) If answer to (a) is yes, please explain how the ICM modeling assumption of total underground feeder plant in the 16-grid area around the wire center comports with FCC Criterion No. 1 for the model to be least cost.

OBJECTION:

GTEFL objects to this interrogatory because it does not seek any relevant information, nor is it calculated to lead to the discovery of any relevant and otherwise admissible information. GTEFL has not filed ICM in this docket. Therefore, there is no reason for AT&T to ask questions about it.

- 49) In regards to drop costs:
- (a) Is it correct that the ICM has an input value assumption that all drops are costed with buried drop material and placement costs?
 - (b) If the answer to (a) is no, please explain why.
 - (c) Is it correct that aerial drop costs are less than buried drop costs for the same length of drop?
 - (d) If the answer to (c) is no, please explain why.
 - (e) If the answers to both (a) and (c) are yes, please explain how the ICM modeling assumption that all drops have buried drop costs comports with FCC Criterion No. 1 for the model to be least cost.

OBJECTION:

GTEFL objects to this interrogatory because it does not seek any relevant information, nor is it calculated to lead to the discovery of any relevant and otherwise admissible information. GTEFL has not filed ICM in this docket. Therefore, there is no reason for AT&T to ask questions about it.

- 50) Please identify and explain all changes in OSP modeling methodology from ICM Release 1 to ICM Release 2 to ICM Release 3.

OBJECTION:

GTEFL objects to this interrogatory because it does not seek any relevant information, nor is it calculated to lead to the discovery of any relevant and otherwise admissible information. GTEFL has not filed ICM in this docket. Therefore, there is no reason for AT&T to ask questions about it.

- 51) Please identify and explain all changes in OSP national default input values from ICM Release 1 to ICM Release 2 to ICM Release 3.

OBJECTION:

GTEFL objects to this interrogatory because it does not seek any relevant information, nor is it calculated to lead to the discovery of any relevant and otherwise admissible information. GTEFL has not filed ICM in this docket. Therefore, there is no reason for AT&T to ask questions about it.

- 53) Please explain how GTE's labor costs utilized in this filing of the ICM are specific to this state.

OBJECTION:

GTEFL objects to this interrogatory because it does not seek any relevant information, nor is it calculated to lead to the discovery of any relevant and otherwise admissible information. GTEFL has not filed ICM in this docket. Therefore, there is no reason for AT&T to ask questions about it.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Objections to AT&T's Second Set of Interrogatories in Docket No. 980696-TP were sent via U.S. mail on August 10, 1998 to the parties on the attached list.


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