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August 12, 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 Third 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,

ACK _____
AFA 2 _____
APP _____
CAF _____
CMU 1 _____
CTR _____
EAG _____
LEG 2 _____
LIN 5 _____
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SEC 1 _____
WAS _____
OTH _____

Kimberly Caswell

KC:tas
Enclosures

A part of GTE Corporation

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the cost of)	Docket No. 980696-TP
basic local telecommunications service)	Filed August 12, 1998
service pursuant to Section 364.025)	
Florida Statutes)	
_____)	

**GTE FLORIDA'S OBJECTIONS TO
AT&T'S THIRD SET OF INTERROGATORIES (54-62)**

GTE Florida Incorporated (GTEFL) files its preliminary objections to the Third Set of Interrogatories served upon GTEFL by AT&T Communications of the Southern States, Inc. (AT&T). GTEFL reserves the right to make additional and/or more complete objections when it files its responses to AT&T's Third Set of Interrogatories.

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.

4. GTEFL's later responses to the interrogatories will be made subject to, qualified by, and made without waiver of each of the foregoing general objections.

SPECIFIC OBJECTIONS

Objection to Interrogatory 55: GTEFL objects to this Interrogatory to the extent it would require GTEFL to produce information about prices and associated information in its third-party vendor contracts. Such information is considered by GTEFL's vendors as highly competitively sensitive; its public disclosure would adversely affect these vendors' relationships with actual and potential clients.

Objection to Interrogatory 56: GTEFL objects to this Interrogatory because it is not a properly framed Interrogatory. It is, rather, a document request, which is improper in the context of these Interrogatories.

Objection to Interrogatory 58: GTEFL objects to this Interrogatory to the extent that it seeks information earlier than 1997. Such information is not relevant to determining the forward-looking cost of providing basic local service, and its production would be unduly burdensome. GTEFL objects, in addition, to the extent this Interrogatory would require GTEFL to produce information about prices and associated information in its third-party vendor contracts. Such information is considered by GTEFL's vendors as highly competitively sensitive; its public disclosure would adversely affect these vendors' relationships with actual and potential clients.

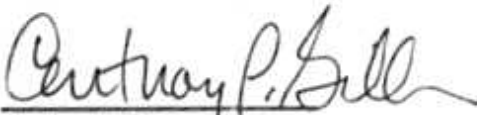
Objection to Interrogatory 59: GTEFL objects to this Interrogatory to the extent it seeks price and other terms of GTEFL's contracts with its third-party vendors. These vendors consider such information to be highly competitive sensitive. Its public disclosure could adversely affect vendors' relationships with actual and potential clients.

Objection to Interrogatory 60: GTEFL objects to this Interrogatory to the extent it seeks price and other terms of GTEFL's contracts with its third-party vendors. These vendors consider such information to be highly competitive sensitive. Its public disclosure could adversely affect vendors' relationships with actual and potential clients.

Objection to Interrogatory 61 GTEFL objects to this Interrogatory to the extent it seeks price and other terms of GTEFL's contracts with its third-party vendors. These vendors consider such information to be highly competitive sensitive. Its public disclosure could adversely affect vendors' relationships with actual and potential clients.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Objections to AT&T's Third Set of Interrogatories in Docket No. 980696-TP were sent via overnight delivery(*) or U.S. mail on August 12, 1998 to the parties on the attached list.


Per Kimberly Caswell

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