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September 2, 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:

This is to inform you of an additional objection GTE Florida Incorporated (GTEFL) will
make when it responds to Staff's Second Set of Interrogatories. This objection came to
light as GTEFL was preparing its responses to the Interrogatories. Specifically, GTEFL
objects to item number 29 as it is vague, ambiguous, overly broad and unduly
burdensome. For example, it is unclear whether Staff is seeking (a) GTEFL's
recommended input values to HAI Model 5.0a, (b) GTEFL's recommended inputs (not
input values) for use in HAI 5.0a, (c) BCPM inputs or input values that do not match
HAI 5.0a's inputs or input values, or (d) HAI 5.0a inputs or input values that do not
match BCPM's inputs or input values.

Moreover, to the extent Staff is seeking a comparison between each of BCPM's inputs
and the nearly one thousand user adjustable inputs contained in the HAI Model, the
response to such a request would require extensive and unduly burdensome efforts on
the part of GTEFL. Due to the hidden workings of the HAI Model, the flaws in HAI's

A part of GTE Corporation

engineering and modeling assumptions, and the lack of clear documentation accompanying HAI 5.0a's submission, it is simply not possible to decipher precisely what each HAI 5.0a input is designed to capture, and how each input value is treated within the inner workings of HAI 5.0a.

Please contact me if you have any questions about this objection.

Sincerely,

Kimberly Caswell

KC:tas

c: Parties of Record