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September 4, 1998

Ms. Blanca S. Bayo, Director
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Re: Docket No. 980733-TL
Discovery for Study on Fair & Reasonable Rates and on Relationships
Among Costs and Charges Associated with Certain Telecommunications
Services Provided by LECs, as Required by Chapter 98-277

Dear Ms. Bayo:

Please find enclosed an original and fifteen copies of GTE Florida Incorporated's
Opposition to Attorney General's Motion to Compel Discovery Responses from GTE for
filing 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.

Sincerely,

Kimberly Caswell

RECEIVED & FILED
[Signature]
FPSC-BUREAU OF RECORDS

Kimberly Caswell

KC:tas
Enclosures

A part of GTE Corporation

DOCUMENT NO.
09651-98
Sept 4

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ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Discovery for Study on Fair and Reasonable Rates and on Relationships Among Costs and Charges Associated With Certain Telecommunications Services Provided by LECs, as Required by Chapter 98-277)
_____)

Docket No. 980733-TL
Filed: September 4, 1998

GTE FLORIDA INCORPORATED'S OPPOSITION TO ATTORNEY GENERAL'S MOTION TO COMPEL DISCOVERY RESPONSES FROM GTE

GTE Florida Incorporated (GTEFL) asks the Commission to deny the Motion to Compel Discovery Responses from GTE, for Expedited Ruling, and Request for Oral Argument (Motion), filed by Robert A. Butterworth, Attorney General (AG), on August 28, 1998. The AG's Motion pertains to its First Set of Interrogatories and Third Request for Production of Documents. Below, for each discovery item at issue, GTEFL explains that the AG has offered no plausible rationale for the Commission to order GTEFL to produce the requested information.

Interrogatories

Interrogatory 1.a: The Commission Staff's June 19, 1998 data request in this case asked GTE to prepare a separations cost study, with intrastate operations divided into interLATA message toll, interLATA special, intraLATA message toll, intraLATA special, "and any further breakdown of local which your system is capable of, such as EAS or local private line." (Part I, Request 3(2)f.) With regard to the quoted clause from the request, GTE did not provide--and was not required to provide--to Staff any breakdown into EAS and local private line categories or any revenue information for local private line. The AG's Interrogatory, however, would require such revenue information, thus going beyond the

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study provided to Staff. GTE thus objected to this question because it does not seek any relevant information and it is not calculated to lead to the discovery of any relevant information. GTE reaffirms that objection here.

Chapter 98-277, Laws of Florida, which sets forth the scope and purpose of this proceeding, provides that local exchange companies (LECs) shall furnish the Commission with cost data and analysis that "support the cost of providing residential basic local telecommunications service....For the purposes of verifying the submitted cost data and analysis, the commission and all intervenors shall have access to the records related to the cost of providing residential basic local telecommunications service of each local exchange company."

Because the information the AG requests is not necessary to "verify[] the submitted cost data and analysis," GTEFL does not need to produce it. The AG's response to GTEFL's objection only underscores this point. The AG highlights the above-quoted statutory prescriptions about the scope of this proceeding and the explicit limits on intervenor access to the information submitted to the Commission. (Motion at 2-3.) The AG then concludes that these provisions mean that discovery "is not limited to information that verifies the cost data and analysis provided to the Commission." (Motion at 2.) This conclusion is, however, directly contrary to the plain language of the statute--which limits intervenor access to only "submitted cost data and analysis" and only "for the purpose of verifying" such submitted information. The AG offers no explanation for its leap from the plain language of the statute to the conclusion that discovery is essentially unconstrained. That is because no such explanation is possible. The AG, in effect, asks the Commission

to read out of the statute the words "For the purpose of verifying the submitted cost data an analysis." Such an interpretation is at odds with basic principles of statutory construction and plain common sense.

Moreover, although the AG itself acknowledges that the inquiry at hand is limited to the "costs of providing residential basic local telecommunications service," (Motion at 2), it nevertheless asks for revenue information in this Interrogatory. Such revenue information has nothing to do with the cost of providing service and nothing to do even with the AG's own justification for posing this Interrogatory.

The only possible purpose the AG could have in asking questions about GTEFL's revenues is to try to turn this proceeding into a kind of rate case. The Commission should not sanction this effort, which the Legislature certainly never intended. Indeed, the Commission has no authority to review GTEFL's earnings (as Commissioners have pointed out at the public hearings in this proceeding) or to conduct a rate proceeding for GTEFL, which has been a price-regulated carrier since January of 1996. GTEFL's rates are, by statute, no longer based on earnings, as they were under traditional, rate-of-return regulation.

For these reasons, this Interrogatory is irrelevant and GTEFL should not be compelled to respond to it.

Interrogatory 2.a: The AG relies here on the same rationale it did for Interrogatory 1.a. GTEFL's objection to Interrogatory 1.a, explained above, likewise applies to Interrogatory 2.a. Again, this Interrogatory seeks specific information about revenues for a number of services. The Commission Staff did not ask GTEFL for such information, it

was not submitted to the Commission, it is irrelevant to this proceeding, and it is beyond the scope of access to LEC data that the Legislature specifically prescribed for intervenors.

Interrogatory 2.b.: The AG relies here on the same rationale it did for Interrogatory 1.a. GTEFL's objection to Interrogatory 1.a, explained above, likewise applies to Interrogatory 2.b. This Interrogatory again asks for a study beyond what the Commission Staff required of GTEFL in its data requests. Such a study would require a manual effort to compile because GTEFL's systems do not even keep data at the level of detail the Interrogatory assumes. As such, the Interrogatory is unduly burdensome and oppressive, as well as irrelevant.

Interrogatory 5.c & d.: The AG here again argues that it is not limited to verifying the data submitted to the Commission. As such, the objection GTE made in response to Interrogatory 1.a applies to these Interrogatories, as well. The AG asks GTE to make study assumptions different than those the Staff required in GTE's Commission submission. By definition, then, the request necessarily goes beyond verification of the submitted data, and it is, therefore, irrelevant.

Interrogatory 6.: The AG here relies on the same rationale it did for Interrogatory 1.a. GTEFL's objection to Interrogatory 1.a, explained above, likewise applies to Interrogatory 6. In this Interrogatory, the AG seeks revenue, investment, and related information for unregulated services. Contrary to the AG's belief, this proceeding is, in fact, limited to regulated services and, in particular, the services the Staff identified for the contribution analysis in its data request. This proceeding is intended to examine the cost of providing

basic residential service. There is nothing in the statute that remotely contemplates that the Commission can or should review detailed information, including revenue statistics, for unregulated services. There is no reason to AG needs such information to verify the cost data and analysis GTE has submitted to the Staff, and no basis in the statute for concluding that this inquiry is supposed to include a determination of whether there is "a reasonable relationship between competitive and non-competitive services" (Motion at 7)--whatever that broad and vague statement might mean. Again, GTE believes the AG wishes to transform this proceeding into a rate case, complete with "adjustments" that have no place within either the context of this proceeding or the price regulation under which GTEFL operates.

Interrogatory 7: This Interrogatory, like Interrogatory 6, asks for detailed revenue, expense, investment, and other information about deregulated services. The AG relies on the same rationale for Interrogatory 7 as it did for Interrogatory 6. GTEFL's objection to Interrogatory 6, explained above, likewise applies here.

Interrogatory 8: The AG states that this Interrogatory "simply asks for the most recent depreciation study" for GTEFL. (Motion at 9.) Even before turning to the reasons why such a depreciation study is irrelevant, GTEFL must correct the AG's statement. The AG is not just asking for the study itself. The request is far more complicated and extensive. Specifically, subpart 8a asks GTE to provide the "best fit" observed average service life indication for all central office equipment accounts and all outside plant equipment accounts in the study. In addition, the Interrogatory asks GTE to state how the "best fit" life was calculated and to provide the best fit average service life indications for

each of the most recent five years in the study, as well as the average of the most recent band that has been calculated, if any.

Having corrected the AG's statement about the scope of the request, GTE reaffirms its objection that the entire Interrogatory is irrelevant and not calculated to lead to the discovery of any relevant information. As GTE has pointed out, the Commission no longer prescribes depreciation rates for GTEFL because GTEFL is a price-regulated carrier. The Commission Staff has not required GTE to provide any information on old depreciation studies in this proceeding and so the information the AG seeks is, again, not necessary to verify any submitted data. Moreover, this proceeding focusses on the cost of providing basic, local residential service. Since GTE uses economic depreciation--and not any depreciation prescriptions--for both regulatory and financial reporting purposes, GTE's last depreciation study (which was not even ruled upon by the Commission) certainly does not accurately reflect GTE's depreciation parameters today or provide any useful information for the Commission in this case. Even if GTE were using prescribed factors, a 1995 study would be severely outdated and inappropriate to use in a 1998 proceeding.

Notwithstanding this objection, and as GTE pointed out in its preliminary objections, the materials associated with GTEFL's 1995 depreciation study (which was the last study GTE did) were publicly filed with the Commission and GTEFL refers the AG to those materials, which the AG can easily obtain itself.

Interrogatory 9: The AG here seeks detailed information on directory advertising operations and results, and GTE's relationship with its directory affiliate. GTEFL reaffirms its objection to this item on the basis that it is irrelevant. Please refer to GTEFL's

explanations of its objections to Interrogatories 1.a and 6, above. GTEFL reiterates that this is not a rate case, and the only possible reason for the AG to seek such information on affiliate relationships and operations is to make rate-case-like adjustments to GTEFL's expenses. The AG admits as much in its Motion, noting that "if all costs that were actually incurred by affiliates were excluded, the costs of most of the services would be much less than GTE-Florida shows in its cost studies." (Motion at 10.) This is not a prudency review of GTEFL's expenses. Such reviews ended when rate-of-return regulation ended for GTEFL. By statute, GTEFL's rates are not set based on its expenses, so there reason for the AG to seek--and for the Commission to sanction--a review of any of GTEFL's affiliate transactions. The information sought, again, goes far beyond what the Staff required GTEFL to submit. Please see also GTEFL's explanations of its interrogatories 1.a and 6, above.

Interrogatories 14, 14a, and 14b: In these Interrogatories the AG seeks information about yellow pages listings for business services. The information sought is irrelevant on several counts. Residential, not business service, is the focus of this proceeding. The information sought--about deregulated services and about a GTE affiliate business--is far beyond the scope of anything the Staff requested of GTE and anything the Legislature contemplated in the statute governing this case. (See GTEFL's objection to Interrogatory 1.a, the rationale of which applies here, as well.) The AG cannot use the Commission's mandate to do a contribution analysis to conduct a free-ranging examination of GTEFL's unregulated services and its affiliate relationships. Again, the Legislature did not intend this to be a rate case, nor is the Commission authorized to conduct a rate case for GTEFL.

Interrogatory 15: This Interrogatory and its subparts seek information on GTEFL's repair policies and repair times for both business and residential basic services. The AG offers the same rationale for Interrogatory 15 as it did for Interrogatory 14, and it is just as inapposite here. GTEFL reaffirms its earlier objection that the information requested is irrelevant. The repair information the AG seeks go far beyond this proceeding's inquiry into the cost of basic local residential service, and far beyond anything the Staff requested of GTEFL. This repair information is not even remotely connected to anything the Staff asked or that the statute contemplates, and is not necessary to verify the data GTEFL has submitted to the Staff.

Interrogatory 18: GTEFL reaffirms its objection that the information sought in this Interrogatory—the annual number of "initiated residential customer disconnections due to non-payment"—is irrelevant. The AG argues that the information is relevant to the affordability criterion in the statute. However, absolutely no meaningful connection can be drawn between disconnections and affordability of basic local residential service. It is a widely recognized fact (which must be known to the AG) that most customer disconnections are related to high toll bills, not to the basic residential portion of the bill. Thus, there is no reason to burden GTEFL with the production of this information which is patently meaningless in the context of this docket. Please also see GTEFL's response to Interrogatory 1.a, which explains that the discovery in this proceeding is limited to cost data and analysis submitted to the Commission. The Commission has not asked for any disconnection statistics in this case.

Interrogatories 19.a and 19.b: The AG relies here on its rationale for Interrogatory

1.a. GTEFL's objections to Interrogatory 1.a, explained above, likewise applies to Interrogatories 19.a and 19.b. Again, the AG has gone beyond the scope of the contribution analysis the Staff requested, asking GTE to perform additional, detailed contribution analyses on services the AG has designated. Only the Commission has the authority to define the scope of the contribution analysis it is to do under the statute. The AG's request is not necessary to verify any cost data or analysis submitted to the Commission. It is thus irrelevant.

Interrogatories 21 and 21.a: The AG relies here on its rationale for Interrogatory 1.a.

GTEFL's objection to Interrogatory 1.a, explained above, likewise applies to Interrogatories 21 and 21.a. Here again, the AG seeks contribution analyses beyond the analysis Staff requested. Indeed, the AG asks for contribution analyses on all the residential services not included in Staff's request. Again, such information is irrelevant because it cannot be used to verify the cost data and analysis submitted to the Commission. Moreover, GTE believes Staff chose the services for the contribution analysis that were the most likely sources of support for basic local service. It deliberately did not request contribution analysis on all services because such an analysis would be unduly burdensome and of little or no use. It is thus unduly burdensome and unreasonable to expect GTE to do this comprehensive analysis for the AG.

Interrogatory 23: The AG relies here on its rationale for Interrogatory 1.a. GTEFL's objection to Interrogatory 1.a, explained above, likewise applies to Interrogatory 23 and its subparts. Neither the interstate nor intrastate statistics on revenue and minutes of use have any conceivable relevancy to this proceeding and they are beyond the scope of the

Commission Staff's inquiry. In addition, GTEFL reiterates its objection that parts a and b of the Interrogatory seek interstate information, which is beyond the scope of this proceeding and outside the Commission's jurisdiction. The AG did not even attempt to reply to this aspect of GTEFL's objection.

Interrogatory 47: GTEFL objected to this Interrogatory to the extent it seeks information that is publicly available in statutes and Commission rules and orders, which the AG can access just as easily as GTEFL can. GTEFL reaffirms this objection.

Requests for Production of Documents

Request 6: GTEFL objected to this continuing document request because it is inconsistent with Florida Rule of Civil Procedure 1.280(e), which makes clear that a responding party has the obligation to make a complete response and has no duty thereafter to file supplementary responses. The AG's response fails to provide any authority for imposing a continuing production obligation upon GTEFL. Instead, the AG notes that parties are to serve copies of interrogatory answers on all other parties (which, contrary to the AG's statement, GTEFL has done) and states that "[t]he same principle applies in the case of production of document requests if requested by a party even informally." GTE is unaware of any such principle embodied in the Florida Rules of Civil Procedure or the Commission's own Rules. In fact, in GTE's experience, it has never been Commission practice to serve all parties with copies of documents produced to other parties. Often, document requests involve many inches of paper or even multiple binders full of documents. Thus, contrary to the AG's assertion, copying and serving document

request responses on other parties is often an undue administrative burden on GTEFL. This is particularly true at present, when GTEFL must respond to extensive discovery from numerous parties in this proceeding and in Docket 980696-TP. It is not as easy as the AG believes for GTEFL to "simply send the Attorney General a response to any party's request at the same time they send the responses to the requesting party." (Motion at 17.) Given the extraordinary burden placed on GTE's resources at this time, it is not unreasonable to expect the AG to consider carefully whether it wants particular information, and to fashion requests pertaining only to those documents which it truly needs.

Request 9: This Request seeks documents supporting GTEFL's response to the AG's Interrogatory 6, which, as explained above, addresses revenues, expenses, and other information for deregulated services. The AG thus relies here on the same rationale it did for Interrogatory 6 and for Interrogatory 1.a. GTEFL's rationale for its objections to those Interrogatories likewise applies to Request 9. The documents sought go beyond the scope of this proceeding contemplated in the statute and are not necessary to verify the cost data and analysis submitted to the Commission.

Request 10: This Request seeks documents supporting the answer to Interrogatory 8, which seeks information on GTEFL's last depreciation study. The AG relies here on its rationale for its objection to Interrogatory 8. GTEFL's rationale for its objection to Interrogatory 8 likewise applies to Request 10. In addition, GTEFL reiterates that the study materials GTEFL filed in 1995 are public record and easily obtainable by the AG. GTEFL thus objects to providing them on that basis, as well.

Request 11: This Request asks GTEFL to fill out a schedule entitled "Analysis of

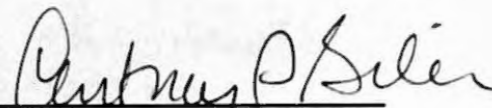
Directory Advertising Operations." First, as GTEFL pointed out in its preliminary objections, this is not a properly framed document request, as it requires GTEFL to prepare a new document, rather than produce one that already exists. The AG has not attempted to respond to this aspect of GTEFL's objection. Second, as GTEFL explained in its objection to Interrogatory 9, information about revenues and other aspects of the directory operation has no relevancy to this proceeding and is not necessary to verify any information submitted to the Commission. As GTEFL has pointed out before, this is not a rate case and GTEFL is not a rate-of-return regulated carrier. It is exempt from filing the schedule the AG requests here. GTEFL refers the Commission to its objection to Interrogatory 9, discussed above, which applies equally here.

Request 12: This request asks for documents supporting GTEFL's answer to Interrogatory 9, which seeks detailed information on directory revenues, expenses, and investment, as well as information on GTEFL's relationship with its directory subsidiary. The AG relies here on its rationale for Interrogatories 1.a and 6. GTEFL's rationale for its objection to Interrogatories 1.a and 6 likewise applies here, as well as its reasoning for objecting to Interrogatory 9.

Request 15: This Request seeks documents supporting GTEFL's response to Interrogatory 15.a, which deals with GTEFL's repair policies and records. As GTEFL explained above, such repair information is not relevant to any purpose in this proceeding and not related to anything that has been submitted to the Staff. GTEFL's rationale for objecting to Interrogatory 15.a, set forth above, applies equally to Request 15.

Request 16: This Request seeks documents supporting GTEFL's repair time goals or requirements addressed in Interrogatory 15.b. GTEFL's rationale for objecting to related Interrogatory 15 and its subparts applies equally to Request 16. GTEFL's repair time goals are unrelated to any matter the Legislature has asked the Commission to study and report about in this case.

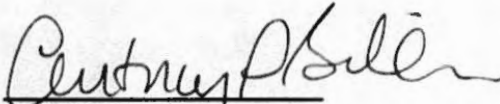
Respectfully submitted on September 4, 1998.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Opposition to Attorney General's Motion to Compel Discovery Responses from GTE in Docket No. 980733-TL were sent via overnight mail on September 3, 1998(*) and U.S. mail on September 4, 1998 to the parties on the attached list.


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