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Ms. Blanca S. Bayo, Director
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Florida Public Service Commission
2540 Shumard Oak Boulevard
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September 10, 1998

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 Robert A. Butterworth's Motion to Compel Responses From GTE, For Expedited Ruling, and Request for Oral Argument for filing in the above matter. GTE understands that oral argument will be held on the Attorney General's Motion to Compel on September 11, 1998. As such, GTE is filing this Opposition to that Motion early, in an effort to assist the Staff and Prehearing Officer to prepare for the oral argument session.

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,

Anthony P. Gillman

Kimberly Caswell

KC:tas
Enclosures

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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 10, 1998

GTE FLORIDA INCORPORATED'S OPPOSITION TO ATTORNEY GENERAL ROBERT A. BUTTERWORTH'S MOTION TO COMPEL RESPONSES FROM GTE, FOR EXPEDITED RULING, AND REQUEST FOR ORAL ARGUMENT

GTE Florida Incorporated (GTEFL) asks the Commission to deny the Attorney General's Motion to Compel Responses from GTE, for Expedited Ruling, and Request for Oral Argument (Motion), filed September 4, 1998. Because the Motion does not present the complete factual background of the dispute at issue, GTE will do so here, before turning to its argument against the Motion.

FACTS

On August 7, 1998, the Attorney General (AG) served its First Set of Interrogatories on GTEFL . There are 136 Interrogatories in that Set, including sub-parts. GTEFL filed its preliminary objections to this First Set on August 19, 1998, and its responses and final objections on September 8, 1998.

On August 20, 1998, the AG served its Second Set of Interrogatories on GTEFL. That Set contains 28 items, including sub-parts. Therefore, the total of interrogatories the AG has served to date on GTEFL is 164 (136 in the First Set and 28 in the Second Set). The interrogatory limit imposed by the Commission in this proceeding is 150. (Order No.

PSC-98-0843-PCO-TL, issued June 25, 1998 (Procedural Order).)

Also on August 20, the AG filed a Notice of Erratum and Withdrawal of Specified Interrogatories and Requests for Production to GTEFL (Notice of Withdrawal). The Notice of Withdrawal attempted to withdraw 66 interrogatories from the First Set of Interrogatories served almost two weeks earlier. It also attempted to withdraw 7 requests for production of documents that were included in the AG's Third Request for Production to GTE, served on August 7, 1998.

On August 28, 1998, the AG served on GTE a Motion to Compel Discovery Responses, for Expedited Ruling, and Request for Oral Argument. That August 28 Motion attempted to withdraw two additional interrogatories from the First Set of Interrogatories and two additional requests for production of documents from the Third Request for Production.

Shortly after receiving the AG's August 20 Notice of Withdrawal, GTEFL contacted the AG to express its view that withdrawal of discovery so late after it was filed was unreasonable. The AG and GTEFL discussed possible settlement of the dispute in conversations during the last week of August. GTEFL proposed a settlement which the AG promised to review with its consultant. GTEFL did not hear back from the AG. Instead, the AG served more discovery (its Fifth Request for Production of Documents) on GTEFL on August 28, 1998. Upon receiving this additional discovery, GTEFL assumed its settlement offer was unacceptable to the AG. GTEFL called the AG to confirm its understanding; the AG indicated that GTEFL was correct--the AG would not accept the settlement offer. GTEFL expressed its regret that the parties could not reach agreement

on this dispute, and told the AG that it had no choice but to refuse to accept the withdrawal and stand on the 150-item limit for interrogatories. GTEFL informed the AG that it would memorialize this approach in a letter. A copy of that letter, dated September 3, 1998, is attached.

On September 4, the AG filed its Motion to compel responses to the Second Set of Interrogatories.

ARGUMENT

I. The AG's Attempted Withdrawal of Discovery Is Legally Unsupportable and Unfair

Despite its title, the AG's Motion to Compel Discovery Responses is really a motion to compel GTEFL to accept the AG's withdrawal of discovery items. The AG seeks to force GTEFL to accept this withdrawal because, without it, the AG is over the 150-item limit for Interrogatories.

The withdrawal the AG seeks is plainly unreasonable and unsupported by any legal authority.

As the statement of facts indicates, the AG has tried to withdraw 68 interrogatories (as well as 9 production requests). This is almost half the 150-interrogatory limit. The withdrawal was not attempted quickly, or with any advance notice to GTEFL. Instead, the AG's Notice of Withdrawal of 66 interrogatories (and 7 document requests) came almost two weeks (specifically, 13 days) into the discovery response period. And the AG didn't even formally notify GTEFL of its withdrawal of the 2 other interrogatories (and 2 document

requests). GTEFL instead discovered the AG's intentions in the context of its August 28 motion to compel discovery responses to the AG's First Set of Interrogatories and Third Request for Production of Documents. Thus, those items were withdrawn three weeks from the time they were submitted. Moreover, all of the 68 interrogatories (and the 9 production requests) were withdrawn after GTEFL had already made its preliminary objections to those requests.

It is shocking that the AG believes it has a right to engage in such discovery abuses. First, there is no authority--and the AG cites none--that would permit unilateral withdrawal of discovery items. To GTEFL's knowledge, there is nothing in the Florida Rules of Civil Procedure or the Commission's Rules that would contemplate this action. Indeed, in GTEFL's experience, it is unprecedented before this Commission. GTEFL has never had any party try to withdraw discovery requests at any point after they were submitted--let alone two to three weeks after.

Second, it is unfair, as a matter of principle, to permit the AG to withdraw discovery requests after objections have already been lodged. As noted, all of the withdrawals were attempted after GTEFL had made its 10-day objections. Thus, the AG could review the objections, formulate its opinion as to the strength of each objection, and choose to pursue only those items which the AG believed it could win on a motion to compel. Moreover, the AG could discern from some of the objections that the underlying question was probably not necessary. For example, some of GTEFL's objections focused on the public availability of certain information. Based on these objections, the AG could decide to drop these questions and obtain the information from sources other than GTEFL. There

is no reason to grant the AG this kind of unfair strategic advantage.

Third, the AG's logic that it can withdraw interrogatories and production requests because it got the requested information "from documents previously made available by GTE" is severely misguided. What this means is that the AG apparently found some of the answers to its Interrogatories within documents GTEFL produced in response to the previous document requests it served upon GTEFL. As the AG should know, this kind of situation occurs all the time, and it is incumbent upon parties to time their discovery and formulate their discovery questions in such a way as to avoid "wasting" questions. Ill-conceived or imprudently timed discovery is not an excuse for relief from the discovery limits imposed by the Commission. When a party serves discovery, it always takes the risk that its questions will be answered before they are due--through testimony, earlier-served discovery or depositions, outside sources, or other means. Parties cannot be allowed to continually revise their discovery--and thus circumvent the discovery limits--as the case proceeds.

It would be entirely inequitable to force GTEFL to bear the consequences of discovery strategy the AG may now regret. By the two-to-three week mark in which the AG tried to withdraw its discovery, GTEFL had already expended considerable time and resources in responding to the discovery served, including the 68 "withdrawn" interrogatories. GTEFL begins work on discovery immediately after it is served. The internal need to quickly and efficiently complete responses is particularly critical in this proceeding, as discovery has been extensive both here and in the ongoing docket 980696-TP. GTEFL had completed much of the responses to the AG's First Set of Interrogatories

when the attempted withdrawals were made. And the fact that GTEFL objected to some of the questions the AG withdrew does not undermine GTEFL's point about the need to devote resources to discovery responses. Before making any objection, GTEFL must evaluate each question to understand what information may exist, in what form, and how it might be relevant to each aspect of the case and GTEFL's presentation. Indeed, some objections take longer to develop and draft than some discovery responses. So the AG can't use the fact that GTEFL has made legitimate objections to dismiss GTEFL's point about expending substantial time and effort in responding to the AG's discovery.

As the AG well knows, the parties' resources have been stretched to their absolute limits by this proceeding and the others initiated under the recent revisions to Chapter 364. The discovery burden on the ILECs, in particular, is enormous. The advantage to be gained by having one party prepare responses to one set of discovery, only to have that discovery withdrawn and more questions served, should not be underestimated.

Fourth, if the Commission lets the AG withdraw its discovery and compels GTEFL to answer additional discovery, it will create a precedent sure to make chaos of the discovery process before this Commission. Every party in every case to be litigated before this Commission would be sure to take full advantage of a ruling that it may withdraw discovery questions weeks after they are submitted, for no reason other than the party determined it needs answers to other questions more. With such a precedent outstanding, there can be no order to the discovery process, and no effective constraints on parties' gaming of the process to obtain unfair advantage.

Finally, the AG's analogy of "withdrawing objections" to withdrawing discovery is

inapposite. It is not true, as the AG claims, that "GTE reserves the right to withdraw its objections." (Motion at 2.) GTEFL has never made such a statement, and does not plan on withdrawing any of its objections. GTEFL may choose to answer some questions, in part or in full, notwithstanding some of its objections, but that is not the same thing. Rather, that practice is a routine part of litigation before this Commission and the courts; the AG's attempted discovery withdrawal is not. Because GTEFL is not "withdrawing" any objections, there is no chance that the AG will have wasted time and effort in drafting a motion to compel. In any case, the time, effort, and personnel involved in GTEFL's having to prepare responses to 68 interrogatories and 9 document requests that are later withdrawn can hardly be compared to drafting a 4-page motion to compel. The AG's constrained analogy of "withdrawing objections" to withdrawing discovery requests only underscores the lack of legal or logical support for the attempted withdrawal.

II. GTEFL's Letter Was Not an "Objection"

As GTEFL noted earlier, it sent the AG a letter on September 3 memorializing its earlier conversation with the AG about the course GTEFL intended to take after the parties could not settle this dispute. Now, the AG attempts to characterize that letter as a "tardy objection" to the AG's discovery and claims that all objections are waived.

First, GTEFL's letter was not an objection, nor was it labeled as such. It was, more properly, a notification that GTEFL would not answer any interrogatories past the 150-item limit. That limit is right in the procedural order. GTEFL need not make objections to preserve it.

Second, the kind of hypertechnical argument the AG makes should not be encouraged because it will only chill any future discussions toward settlement of discovery disputes. GTEFL could have sent a letter to the AG (or filed a formal motion with the Commission) as soon as it received the AG's letter withdrawing the interrogatories. GTEFL chose instead to contact the AG, inform it of GTEFL's view of the withdrawal, and direct the discussion toward settlement. Because the AG appeared receptive to a reasonable settlement of this matter, GTEFL did not believe any official filing was immediately necessary. GTEFL believed the AG would seriously consider settlement, and would contact GTEFL before filing any more discovery. In retrospect, GTEFL was wrong, but GTEFL still retains the hope that it can work with parties to informally work out discovery disputes before routinely resorting to formal filings and motions. In GTEFL's experience, the Commission strongly favors private settlement of discovery disputes.

Third, even if GTEFL's letter is considered an objection, GTEFL did not waive its objections to the AG's discovery because it filed the letter outside the 10-day preliminary objection period. Under the Commission's procedural Order, a discovery respondent is given a 10-day period to notify the other party that it "intends to object to or ask for clarification of the discovery request....This procedure is intended to reduce delay in resolving discovery disputes. (Procedural Order at 1.) To GTEFL's knowledge, no party to this proceeding considers this 10-day period to be the deadline for all final objections. Frequently, objections become known only as parties proceed to prepare discovery responses. As such, parties typically reserve the right to make additional or different objections at the time their final responses are served. The 10-day period is considered

to be preliminary--as the Commission points out, to give the serving party notice that the respondent intends to object or ask for clarification and to reduce delays in resolving discovery disputes. As soon as GTEFL received the AG's letter withdrawing discovery (that is, well before the 10-day period had passed), it knew GTEFL was not inclined to accept the withdrawal. In addition, the AG appeared interested in settlement talks with GTEFL. Since the AG has known GTEFL's views all along, it cannot claim that GTEFL has violated the policy behind the 10-day period preliminary objection period--that is, to initiate resolution of discovery disputes. Indeed, GTEFL's actions, if anything, furthered that objective.

III. The AG's Characterizations of GTEFL's Actions Are Wrong

In its Motion, the AG makes statements about GTEFL's motives and conduct that are so offensive that they cannot stand uncorrected. The AG states: "After initially experiencing and appreciating a very cooperative relationship with GTE, regrettably, the Attorney General has more recently experienced retaliatory and obstructionist behavior from GTE which has steadily escalated over the course of this proceeding." (Motion at 1.) GTEFL has long had--and until the AG's Motion arrived, thought it still had--a good working relationship with the AG's Office. The AG does not give any examples of so-called "retaliatory and obstructionist" behavior and GTEFL is puzzled as to what these accusations could mean. GTEFL has gone out of its way to accommodate the AG in discovery matters, making concessions that it has not made for any other party to this

proceeding. Indeed, on the very day the AG filed its Motion, GTEFL made changes the AG requested in GTEFL's third-party vendor protective agreement. These concessions were very difficult and time-consuming for GTEFL to obtain from its vendors, and were very extraordinary. If GTEFL had adopted a course of obstructionist and retaliatory behavior, as the AG claims, it would have refused to even consider the changes and told the AG to take the matter to the Commission. In light of this example of GTEFL's conciliatory behavior (and there are several others), GTEFL is at a loss to understand the AG's characterization of its conduct. It seems that GTEFL's conduct is reasonable, in the AG's view, only so long as the AG receives the concessions it seeks. If it does not, GTEFL is deemed retaliatory and obstructionist.

Likewise, GTEFL cannot understand the AG's calling GTEFL "spiteful" in "answering discovery which has been withdrawn." (Motion at 3.) First, as GTEFL pointed out, it had already, for the most part, prepared discovery answers to the interrogatories at issue when the AG attempted to withdraw them much later. Second, the AG incorrectly assumes its withdrawal was effective when attempted. As GTEFL has explained here, the notice of withdrawal was highly unusual and patently unreasonable. There was no reason--and no legal authority--to expect GTEFL to automatically agree to the withdrawal. Third, in order to preserve its argument that the withdrawal was unacceptable, GTEFL had to answer the discovery items that were withdrawn.

IV. The AG Has Shown No Reason to Increase the Interrogatory Limit

If the Commission rejects the AG's withdrawal, the AG proposes the alternative of

modifying the discovery limits to permit a total of 300 interrogatories and requests for production, rather than the existing 150 limit on both interrogatories and production requests. Presumably, this modification would need to apply to all parties, as the AG seems to realize, and as the Procedural Order indicates: "Unless subsequently modified by the Discovery Prehearing Officer, the following shall apply: interrogatories, including all subparts, shall be limited to 150, and requests for production of documents, including all subparts, shall be limited to 150." (Procedural Order at 1-2.) This phrasing indicates that any modifications would be made generically, not for just one party. Indeed, it would be unfair, especially so late in the discovery process, to relax the discovery constraints--whether for just the AG or all parties--when all the other parties have had to plan their discovery thus far within the limits the Commission has imposed.

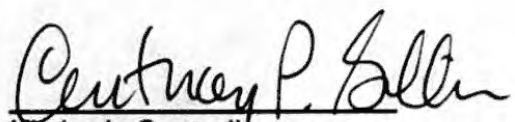
Furthermore, the Commission would need some good reason to modify the discovery limits. As explained above, the AG has offered none (and no other party has asked for such modification). The fact that the AG got some answers elsewhere before they were due is entirely unpersuasive, for the reasons set forth above. And it is not relevant, as the AG claims, that it has over 100 requests for production remaining within the 150 limit. The limit the Commission has imposed on interrogatories is 150. The only way the AG's balance of production requests would be relevant is if the Commission had originally ordered a 300-item total for discovery requests.

The AG asserts that it could have "converted many interrogatories to requests for production," rather than serve more interrogatories. (Motion at 3.) Indeed, this is what the AG told GTEFL it planned to do when the parties could not settle this matter themselves.

GTEFL wonders why the AG didn't simply do what it intended, thus obviating any need for bringing this dispute before the Commission.

For all the reasons discussed here, GTEFL asks the Commission to deny the AG's Motion to Compel, to hold the AG's unilateral withdrawal of discovery items to be ineffective, and to refuse to modify the discovery limits imposed in the Procedural Order. By GTEFL's calculations, the AG reached the 150-interrogatory limit with its question 64 in the AG's Second Set of Interrogatories. Therefore, GTEFL should not be compelled to answer any interrogatories beyond that point.

Respectfully submitted on September 10, 1998.

By: 

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September 3, 1998 -- **SENT VIA FACSIMILE**

Michael A. Gross
Assistant Attorney General
Office of the Attorney General
PL-01, The Capitol
Tallahassee, FL 32399-1050

Re: Docket No. 980733-TL

Dear Michael:

I am writing about the Attorney General's notice of withdrawal of a number of items in its First Set of Interrogatories and its Third Request for Production of Documents. The AG's notice of withdrawal was dated August 20. In addition, the AG attempted to withdraw additional items in its August 28 motion to compel against GTEFL. The discovery in which the withdrawn questions were included is dated August 6.

As we discussed, GTE believes it is unreasonable to attempt to withdraw discovery questions two to three weeks after they were served upon GTEFL. Before the withdrawals were filed, GTE had already filed its objections to the AG's interrogatories and production requests, and it had already expended considerable time and resources in preparing its responses to the discovery. As you know, this is not an insignificant concern, in that the parties' resources have been stretched to their limits by the various proceedings the Commission must conduct pursuant to Legislative directive.

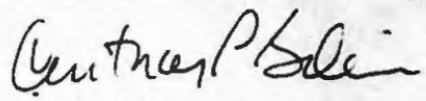
In addition, as you know, parties are limited to 150 each of interrogatories and production requests. When the AG attempted to withdraw interrogatories, it was

nearing the interrogatory limit. Withdrawal of 66 interrogatories would thus leave the AG with much greater leeway to file additional discovery upon GTEFL. GTEFL believes it is unfair and unduly burdensome to expect GTEFL to answer this additional discovery, especially since GTEFL had, as noted, already made objections and prepared responses to the withdrawn items. Also, as we discussed, every party makes decisions about timing of discovery. GTEFL should not be expected to bear the risk of a party obtaining responses to its questions from other sources (or determining that it does not need responses to them) before the discovery responses are due.

I am sorry we could not work out a compromise on this matter. The only reasonable option GTEFL has at this point is to refuse to accept the AG's withdrawal of interrogatories and production requests, answer the discovery as originally submitted, and count those discovery items against the 150 limit. Under this approach, the AG has already exceeded its limit on interrogatories. GTEFL will thus count up to 150 and not answer any more interrogatories than that.

If you have any questions, please contact me.

Sincerely,



for Kimberly Caswell

KC:tas

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Opposition to Attorney General Robert A. Butterworth's Motion to Compel Responses From GTE, For Expedited Ruling, and Request for Oral Argument in Docket No. 980733-TL were sent via overnight mail on September 9, 1998(*) and U.S. mail on September 10, 1998 to the parties on the attached list.

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