



JACK SHREVE  
PUBLIC COUNSEL

STATE OF FLORIDA  
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature  
111 West Madison St.  
Room 812  
Tallahassee, Florida 32399-1400  
850-488-9330

ORIGINAL  
RECEIVED - FPSC  
00 JAN 13 PM 2:30  
RECORDS AND  
REPORTING

January 13, 2000

Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Re: Docket No. 991376-TL-WS

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of Citizens' Notice of Intent to Use Documents.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Sincerely,

Charles J. Beck  
Deputy Public Counsel

- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAE \_\_\_\_\_
- CMR \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 2
- MAA 3
- OPC \_\_\_\_\_
- RRR \_\_\_\_\_
- SEC 1
- WAW \_\_\_\_\_
- OTH \_\_\_\_\_

CJB:bsr  
Enclosures

RECEIVED & FILED  
  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE  
00571 JAN 13 8  
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Initiation of Show Cause	)	Docket no. 991376-TL
Proceedings against GTE Florida,	)	
Inc., for Violation of Service Standards	)	Filed January 13, 2000

---

NOTICE OF INTENT TO USE DOCUMENTS

Pursuant to rule 25-22.006, Florida Administrative Code, the Citizens of Florida (Citizens), by and through Jack Shreve, Public Counsel, file this notice of intent to use certain documents provided by GTE Florida, Inc.(GTE) in response to our first set of requests for production of documents.

1. On September 20, 1999, the Citizens served a set of requests for production of documents on GTE. Although the company responded with many objections, it nonetheless produced some documents. On November 18, 1999, GTE filed a notice of intent to seek confidential classification of all material so produced.

2. Rule 25-22.006(6)(c), Florida Administrative Code, provides the following:

“(6) Discovery.

(c) When a utility or other person agrees to allow Public Counsel to inspect or take possession of utility information for the purpose of determining what information is to be used in a proceeding before the Commission, the utility may request a temporary protective order exempting the information from Section 119.07(1), F.S. If the information is to be used in a proceeding before the Commission, then the utility must file a specific request for a protective order under Paragraph (a) above. If the information

is not to be used in a proceeding before the Commission, then Public Counsel shall return the information to the utility in accordance with the record retention requirements of the Department of State.

3. The Citizens provide this notice to GTE that we intend to use the following documents in this proceeding. Further notices may be sent after we receive and analyze additional documents.

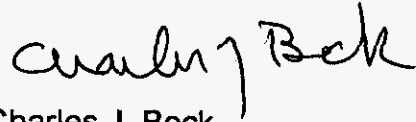
POD Item Number	Document Number	Document Date	Document Description
1	0.003	971112	Daily responsibility to meet PSC svc. Rqts.
1	0.004	980408	Letter to PSC re: poor service performance
1	0.006	991022	Emergency procedures
1	0.008	980501	Daks to Ferrell re: Action Plan & Staffing
1	0.009	990902	Ferrel to Keith re: service improvement plans
1	0.010	970714	Daks to Keith: service load
1	0.011	980217	Daks to Keith: service load
1	0.012	980127	Daks to Keith: service load
1	0.013	980629	Daks to Keith: service load
1	0.014	971107	Diamond to hdq. Re: budget & staffing
1	0.015	970805	Daks to hdq. Re: repeats, reports, oos
1	0.017	970820	Weather impact in Florida--Study
1	0.018	970820	Chart: rainfall, dispatches, lightning
1	0.019	970122	Florida Region Operational Update 8/97
1	0.020	991004	PSC results 9/99
1	0.021	980107	Daks to Keith: service emergency
1	0.022	980107	Chart: rainfall, dispatches, lightning
1	0.023	990723	Diamond to Early: Cost per dispatch
1	0.024	990913	Diamond est. cost for 5% improvement
1	0.025	990621	Budget reduction--41 technicians
1	0.026	981222	99 budget--12m reduction--14.1m stretch
1	0.027	990601	OOS OV24 Improvement plan
1	0.029	990910	OOS OV24 Results--staffing plans
1	0.031	991006	NID policy letter
1	0.032	991006	OOS definition
1	0.035	991014	changing nos to oos policy

1	0.037	991028	October final results
1	0.038	991004	September final results
1	0.040	990928	To Bret from Brandy Re: TAS default cutoff
1	0.042	990801	1998 psc audit
4	0.043	970100	1997 Florida Region Stats Report
4	0.044	970200	1997 Florida Region Stats Report
4	0.045	970300	1997 Florida Region Stats Report
4	0.046	970400	1997 Florida Region Stats Report
4	0.047	970500	1997 Florida Region Stats Report
4	0.048	970600	1997 Florida Region Stats Report
4	0.049	970700	1997 Florida Region Stats Report
4	0.050	970800	1997 Florida Region Stats Report
4	0.051	970900	1997 Florida Region Stats Report
4	0.052	971000	1997 Florida Region Stats Report
4	0.053	971100	1997 Florida Region Stats Report
4	0.054	971200	1997 Florida Region Stats Report
4	0.055	980100	1998 Florida Region Stats Report
4	0.056	980200	1998 Florida Region Stats Report
4	0.057	980300	1998 Florida Region Stats Report
4	0.058	980400	1998 Florida Region Stats Report
4	0.059	980500	1998 Florida Region Stats Report
4	0.060	980600	1998 Florida Region Stats Report
4	0.061	980700	1998 Florida Region Stats Report
4	0.062	980800	1998 Florida Region Stats Report
4	0.063	980900	1998 Florida Region Stats Report
4	0.064	981000	1998 Florida Region Stats Report
4	0.065	981100	1998 Florida Region Stats Report
4	0.066	981200	1998 Florida Region Stats Report
4	0.067	990100	1999 Florida Region Stats Report
4	0.068	990200	1999 Florida Region Stats Report
4	0.069	990300	1999 Florida Region Stats Report
4	0.071	990500	1999 Florida Region Stats Report
4	0.072	990600	1999 Florida Region Stats Report
4	0.073	990700	1999 Florida Region Stats Report
4	0.074	990800	1999 Florida Region Stats Report
4	0.075	990900	1999 Florida Region Stats Report
14	0.076	970100	Customer Relations Contacts
14	0.077	970200	Customer Relations Contacts
14	0.078	970300	Customer Relations Contacts
14	0.079	970400	Customer Relations Contacts
14	0.080	970500	Customer Relations Contacts

14	0.081	970600	Customer Relations Contacts
14	0.082	970700	Customer Relations Contacts
14	0.083	970800	Customer Relations Contacts
14	0.084	970900	Customer Relations Contacts
14	0.085	971000	Customer Relations Contacts
14	0.086	971100	Customer Relations Contacts
14	0.087	971200	Customer Relations Contacts
14	0.088	980100	Customer Relations Contacts
14	0.089	980200	Customer Relations Contacts
14	0.090	980300	Customer Relations Contacts
14	0.091	980400	Customer Relations Contacts
14	0.092	980500	Customer Relations Contacts
14	0.093	980600	Customer Relations Contacts
14	0.094	980700	Customer Relations Contacts
14	0.095	980800	Customer Relations Contacts
14	0.096	980900	Customer Relations Contacts
14	0.097	981000	Customer Relations Contacts
14	0.098	981100	Customer Relations Contacts
14	0.099	981200	Customer Relations Contacts
14	0.100	990100	Customer Relations Contacts
14	0.101	990200	Customer Relations Contacts
14	0.102	990300	Customer Relations Contacts
14	0.103	990400	Customer Relations Contacts
14	0.104	990500	Customer Relations Contacts
14	0.105	990600	Customer Relations Contacts
14	0.106	990700	Customer Relations Contacts
14	0.107	990800	Customer Relations Contacts
14	0.108	990900	Customer Relations Contacts
4	0.109	970923	Region Operations Review
4	0.110	971121	Region Operations Review
4	0.111	971231	Region Operations Review
4	0.112	980622	Region Operations Review
4	0.113	981231	Region Operations Review
4	0.114	970122	Region Operations Review
4	0.115	990614	Region Operations Review
4	0.116	990713	Region Operations Review
4	0.117	991029	Region Operations Review
4	0.118	970100	Narrative-RORR
4	0.119	970200	Narrative-RORR
4	0.120	970300	Narrative-RORR
4	0.121	970400	Narrative-RORR

4	0.122	970500	Narrative-RORR
4	0.123	970600	Narrative-RORR
4	0.124	970700	Narrative-RORR
4	0.125	970800	Narrative-RORR
4	0.126	970900	Narrative-RORR
4	0.127	971000	Narrative-RORR
4	0.128	971100	Narrative-RORR
4	0.129	971200	Narrative-RORR
4	0.130	980100	Narrative-RORR
4	0.131	980200	Narrative-RORR
4	0.132	980300	Narrative-RORR
4	0.133	980400	Narrative-RORR
4	0.134	980500	Narrative-RORR
4	0.135	980600	Narrative-RORR
4	0.136	980700	Narrative-RORR
4	0.137	980800	Narrative-RORR
4	0.138	980900	Narrative-RORR
4	0.139	980900	Narrative-RORR
4	0.140	981000	Narrative-RORR
4	0.141	981100	Narrative-RORR
4	0.142	981200	Narrative-RORR
4	0.143	990100	Narrative-RORR
4	0.144	990200	Narrative-RORR
4	0.145	990300	Narrative-RORR
4	0.146	990400	Narrative-RORR
4	0.147	990500	Narrative-RORR
4	0.148	990600	Narrative-RORR
4	0.149	990700	Narrative-RORR
4	0.150	990800	Narrative-RORR
4	0.151	990900	Narrative-RORR
4	0.152	991000	Narrative-RORR
4	0.153	981027	Targeted Operations Review
14	0.154	991000	Florida Complaints—Inst./Mtnce 1997-1999
15	0.155	991122	Customer Attitude Surveys 1997-1999
4	0.700	990400	1999 Florida Region Stats Report

**WHEREFORE, the Citizens file this notice of intent to use documents.**



**Charles J. Beck  
Deputy Public Counsel  
Fla. Bar. No. 217281**

**Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street  
Room 812  
Tallahassee, FL 32399-1400**

**(850) 488-9330**

**Attorneys for the Citizens  
of Florida**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail or hand-delivery to the following parties on this 13<sup>th</sup> day of January, 2000.



Charles J. Beck

Kimberly Caswell  
GTE Florida Incorporated  
P.O. Box 110, FLTC0007  
Tampa, FL 33601-0110

Cathy Bedell  
Division of Legal Services  
FL Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Rick Moses  
Communications Division  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399