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May 22, 2000

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RECORDS AND
REPORTING

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

Re: Docket No. 990649-TP
Investigation into Pricing of Unbundled Network Elements

Dear Ms. Bayo:

Please find enclosed for filing in the above matter an original and fifteen copies of GTE Florida Incorporated's Opposition to Motion for Extension of Time for Filing Testimony. 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
Kimberly Caswell

KC:tas
Enclosures

- AFA _____
- APP _____
- CAF _____
- CMU 1
- CTR _____
- EAG _____
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- SEC 1
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FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of unbundled network elements) Docket No. 990649-TP
) Filed: May 22, 2000
)

GTE FLORIDA INCORPORATED'S OPPOSITION TO MOTION FOR EXTENSION OF TIME FOR FILING TESTIMONY

GTE Florida Incorporated (GTE) opposes the Motion for Extension of Time for Filing Testimony, submitted by AT&T Communications of the Southern States, Inc., MCI WorldCom, Inc., and the Florida Competitive Carriers Association (Movants) on May 17, 2000.

The schedule in this docket requires ALECs to file direct testimony (and any cost studies), along with their rebuttal to the ILECs' direct testimony, on June 1, 2000. ILECs must file rebuttal testimony on June 22, 2000. Movants ask the Commission to move the ALECs' direct and rebuttal testimony due date to June 15 and the ILECs' rebuttal testimony due date to June 29. GTE opposes this request.

The current schedule gives GTE three weeks to prepare its rebuttal testimony, including analysis of any cost studies the ALECs may file. The Movants would cut this time to just two weeks. This is an unreasonable proposal. The existing three-week period for preparing rebuttal is already ambitious; cutting this time by another week will curtail any opportunity for GTE to do a meaningful analysis of the ALECs' positions, let alone to write several pieces of testimony. It would also undermine GTE's ability to engage in discovery, particularly with regard to ALEC cost studies.

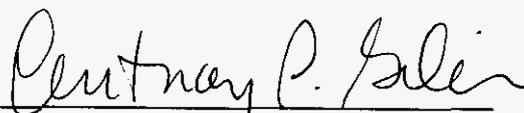
In addition, the Movants' requested action would be unduly prejudicial and unfair to GTE. They seek to hold GTE to a two-week period for filing its rebuttal, but the extension will give them a *six-week* period in which to prepare their own rebuttal to

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GTE's direct testimony filed on May 1, 2000. Moreover, the reason for the extension has nothing to do with GTE, but is motivated by purported "complications related to evaluating BellSouth's completely new cost model." (Motion at 1.) GTE should not be penalized for events beyond its control.

The Motion states that GTE would oppose an extension longer than one week. (Motion at 2.) That is not an accurate characterization of GTE's position. GTE opposes *any* extension that would decrease the existing period for GTE to prepare rebuttal, and/or that would unduly lengthen the time the ALECs have for filing their own cost studies and rebuttal to GTE's direct testimony. In this regard, the relief Movants propose would not only grant them more time to address BellSouth's study, it would give them additional time to prepare and file their own cost studies. However, the alleged problems with review of BellSouth's study do not affect the Movants' ability to file their own studies, so there is no need to change the date their studies are filed. Any relief the Commission may grant to Movants should be tailored to the specific problem they have raised with regard to BellSouth's cost model; there is no reason to grant them relief that might affect GTE.

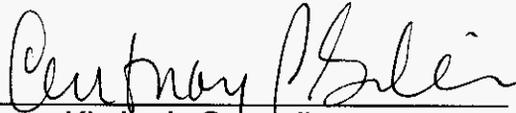
Respectfully submitted on May 22, 2000.

By: 
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Attorney for GTE Florida Incorporated

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Opposition to Motion for Extension of Time for Filing Testimony in Docket No. 990649-TP were sent via overnight delivery(*) on May 19, 2000 or U.S. mail on May 22, 2000 to the parties on the attached list.


for Kimberly Caswell

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