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May 24, 2000

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 Objections to AT&T Communications of the Southern States, Inc.'s First Request for Production of Documents. Also enclosed are an original and fifteen copies of GTE Florida Incorporated's Objections to AT&T Communications of the Southern States, Inc.'s First Set of Interrogatories. 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

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into pricing of unbundled network elements )

Docket No. 990649-TP Filed: May 24, 2000 )

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**GTE FLORIDA INCORPORATED'S OBJECTIONS TO AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.'S FIRST SET OF INTERROGATORIES**

GTE Florida Incorporated ("GTEFL"), by counsel and pursuant to the procedural order in this case (Order No. PSC-00-0540-PCO-TP), hereby files its initial objections to AT&T Communications of the Southern States, Inc.'s ("AT&T") First Set of Interrogatories. GTEFL reserves the right to make additional and/or more complete objections when it files its responses to AT&T's First Set of Interrogatories.

**GENERAL OBJECTIONS**

GTEFL generally objects to AT&T's First Set of Interrogatories as follows:

1. GTEFL objects to AT&T's definition of "GTE" to the extent it includes GTE's "affiliates," "parents," "subsidiaries," "agents," "representatives," and all other entities that are not GTEFL. The purpose of this proceeding is to establish rates for unbundled network elements based on long run forward-looking costs. Only GTEFL's costs and associated information are relevant to this purpose. GTEFL will thus respond to AT&T's discovery only on its own behalf.
2. GTEFL objects to AT&T's First Set of Interrogatories to the extent that it seeks the identification of documents or portions of documents protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or immunity. The inadvertent production of any privileged document shall not be deemed to be a waiver of any applicable privilege with respect to such document or to the

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subject matter of the document. GTEFL specifically reserves the right to demand the return of any such privileged documents, without prejudice to any claim of privilege, in the event any such document is inadvertently produced.

3. GTEFL objects to AT&T's First Set of Interrogatories to the extent it seeks information not relevant to the subject matter of this action and not reasonably calculated to lead the discovery of admissible evidence.

4. GTEFL objects to AT&T's First Set of Interrogatories to the extent it is unduly burdensome, vague, ambiguous, over broad, annoying, harassing or fails to specify clearly the information requested. Moreover, GTEFL objects to AT&T's First Set of Interrogatories to the extent that it seeks information that is obtainable from some other source that is more convenient, less burdensome, or less expensive.

5. GTEFL objects to AT&T's First Set of Interrogatories to the extent it purports to impose on GTE greater obligations than those imposed by the Florida Rules of Civil Procedure.

6. GTEFL objects to AT&T's First Set of Interrogatories to the extent it requires GTEFL to concede the relevance, materiality, or admissibility of the documents sought by each request, as GTEFL reserves its right to raise all such objections in this or any other action.

7. GTEFL's later responses to AT&T's First Set of Interrogatories will be made subject to, qualified by, and without waiver of each of the foregoing General Objections and the following Specific Objections.

## **INTERROGATORIES**

GTEFL specifically objects to AT&T's First Set of Interrogatories as follows:

1. For each year, 1990 through 1999, please provide for each account and subaccount (e.g. - metallic and non-metallic), and in total, the following data for GTE-Florida pursuant to FCC books:
  - a. Beginning-of-year plant in service and depreciation reserve balance
  - b. End-of-year plant in service and depreciation reserve balance
  - c. Plant additions
  - d. Plant retirements
  - e. Depreciation accruals
  - f. Transfers and adjustments.

### **OBJECTION:**

GTEFL objects to this Interrogatory on the grounds that it is overbroad and unduly burdensome in that it seeks information prior to 1998. Such historical information is irrelevant to this proceeding, which is intended to establish rates for unbundled network elements based upon long run, forward-looking cost. GTEFL further objects to this Interrogatory on the grounds that it requests information that is publicly filed and easily obtainable by AT&T, and also objects to providing FCC data.

2. Please provide the data requested in AT&T Interrogatory Request No. 1 pursuant to intrastate books, if different.

**OBJECTION:**

GTEFL objects to this Interrogatory on the grounds it is overbroad and unduly burdensome in that it seeks information prior to 1998. Such historical information is irrelevant to this proceeding, which is intended to establish rates for unbundled network elements based upon long run, forward-looking cost. GTEFL further objects to this Interrogatory on the grounds that it requests information that is publicly filed and easily obtainable by AT&T.

3. Please provide current planning forecast for data in AT&T Interrogatory Request No. 1 for years 2000 forward.

**OBJECTION:**

GTEFL objects to this Interrogatory because, to the extent GTEFL has any responsive data, it is proprietary and highly confidential competitive information. AT&T routinely objects to providing its own investment and planning data to its competitors on the same grounds. GTEFL cannot be expected to produce such sensitive data to AT&T. GTEFL further objects to this Interrogatory on the grounds that planning forecast information is irrelevant to selecting a cost model to determine the long run forward-looking cost of providing unbundled network elements, and is not otherwise relevant to any issue in this proceeding.

4. Please provide GTE's current planning forecast for provision of cable television services in Florida, and identify technology (i.e. - wireline or wireless).

**OBJECTION:**

GTEFL objects to this Interrogatory because, to the extent GTEFL has any responsive data, it is proprietary and highly confidential competitive information. AT&T routinely objects to providing its own investment and planning data to its competitors on the same grounds. GTEFL cannot be expected to produce such sensitive data to AT&T. GTEFL further objects to this Interrogatory on the grounds that planning forecast information is irrelevant to selecting a cost model to determine the long run forward-looking cost of providing unbundled network elements, and is not otherwise relevant to any issue in this proceeding.

5. Please provide GTE's current planning forecast for provision of DSL services in Florida.

**OBJECTION:**

GTEFL objects to this Interrogatory because, to the extent GTEFL has any responsive data, it is proprietary and highly confidential competitive information. AT&T routinely objects to providing its own investment and planning data to its competitors on the same grounds. GTEFL cannot be expected to produce such sensitive data to AT&T. GTEFL further objects to this Interrogatory on the grounds that planning forecast information is irrelevant to selecting a cost model to determine the long run forward-looking cost of providing unbundled network elements, and is not otherwise relevant to any issue in this proceeding.

6. Please provide list of projection lives and future net salvage percents as currently prescribed by the Florida Public Service Commission.

7. Please provide GTE's current planning forecast for ATM switch deployment.

**OBJECTION:**

GTEFL objects to these Interrogatories because, to the extent GTEFL has any responsive data, it is proprietary and highly confidential competitive information. AT&T routinely objects to providing its own investment and planning data to its competitors on the same grounds. GTEFL cannot be expected to produce such sensitive data to AT&T. GTEFL further objects to this Interrogatory on the grounds that planning forecast information is irrelevant to selecting a cost model to determine the long run forward-looking cost of providing unbundled network elements, and is not otherwise relevant to any issue in this proceeding.

8. Please identify whether GTE's ATM deployment will be as an "overlay" network, or will replace digital switches.

**OBJECTION:**

GTEFL objects to this Interrogatory because, to the extent GTEFL has any responsive data, it is proprietary and highly confidential competitive information. AT&T routinely objects to providing its own investment and planning data to its competitors on the same grounds. GTEFL cannot be expected to produce such sensitive data to AT&T. GTEFL further objects to this Interrogatory on the grounds that planning forecast information is irrelevant to selecting a cost model to determine the long run forward-looking cost of providing unbundled network elements, and is not otherwise relevant to any issue in this proceeding.

9. If GTE anticipates that the deployment of ATM switching will displace any of its existing switches, please identify those switching locations which will be displaced and their anticipated replacement date.

**OBJECTION:**

GTEFL objects to this Interrogatory because, to the extent GTEFL has any responsive data, it is proprietary and highly confidential competitive information. AT&T routinely objects to providing its own investment and planning data to its competitors on the same grounds. GTEFL cannot be expected to produce such sensitive data to AT&T. GTEFL further objects to this Interrogatory on the grounds that planning forecast information is irrelevant to selecting a cost model to determine the long run forward-looking cost of providing unbundled network elements, and is not otherwise relevant to any issue in this proceeding.

10. Please provide GTE's current planning forecast for SONET deployment.

**OBJECTION:**

GTEFL objects to this Interrogatory because, to the extent GTEFL has any responsive data, it is proprietary and highly confidential competitive information. AT&T routinely objects to providing its own investment and planning data to its competitors on the same grounds. GTEFL cannot be expected to produce such sensitive data to AT&T. GTEFL further objects to this Interrogatory on the grounds that planning forecast information is irrelevant to selecting a cost model to determine the long run forward-looking cost of providing unbundled network elements, and is not otherwise relevant to any issue in this proceeding.



11. Please provide GTE's current planning forecast for fiber in the distribution network.

**OBJECTION:**

GTEFL objects to this Interrogatory because, to the extent GTEFL has any responsive data, it is proprietary and highly confidential competitive information. AT&T routinely objects to providing its own investment and planning data to its competitors on the same grounds. GTEFL cannot be expected to produce such sensitive data to AT&T. GTEFL further objects to this Interrogatory on the grounds that planning forecast information is irrelevant to selecting a cost model to determine the long run forward-looking cost of providing unbundled network elements, and is not otherwise relevant to any issue in this proceeding.

12. Please provide actual deployment data for ATM, SONET and fiber in distribution network.
13. Please provide the average percent fill of metallic cable for the Company's interoffice and feeder plant at the end of each year 1990 through 1999.

**OBJECTION:**

GTEFL objects to these Interrogatories on the grounds that they are overbroad and unduly burdensome in that they seek information prior to 1998. Such historical information is irrelevant to this proceeding, which is intended to establish rates for unbundled network elements based upon long run, forward-looking cost.

14. Please identify the average size and length of metallic fiber cable the Company's interoffice, feeder and distribution facilities as of 12/31/1999.

**OBJECTION:**

GTEFL objects to this Interrogatory on the grounds that the term "metallic fiber cable" is vague and ambiguous, and asks AT&T to clarify its use of this term.

15. Please provide the most current engineering forecasts of equipment line counts and local switching demand (minutes of use) by central office switch in the Company's territory.
16. For each of the cable accounts (Aerial, Underground, Buried), please provide the number of circuits served by metallic versus fiber at the end of each year 1990 through 1999. Also, please separate these circuits into one of the three categories: interoffice, feeder, distribution.

**OBJECTION:**

GTEFL objects to these Interrogatories on the grounds that they are overbroad and unduly burdensome in that they seek information prior to 1998. Such historical information is irrelevant to this proceeding, which is intended to establish rates for unbundled network elements based upon long run, forward-looking cost.

17. Please provide the sheath feet of metallic and fiber cable by classification (interoffice, feeder and distribution cable) as of 12/31/99 within the Company's serving area and the related investment for each classification by account.

**OBJECTION:**

GTEFL objects to this Interrogatory because it seeks historical information that is irrelevant to this proceeding, which is intended to establish rates for unbundled network elements based upon long run, forward-looking cost. In addition, to the extent GTEFL has any such information, it is confidential and proprietary.

18. Please identify the number of circuits transferred from metallic cable to fiber cable during each of the last five years by classification.

**OBJECTION:**

GTEFL objects to this Interrogatory on the grounds it is overbroad and unduly burdensome in that it seeks information prior to 1998. Such historical information is irrelevant to this proceeding, which is intended to establish rates for unbundled network elements based upon long run, forward-looking cost. In addition, to the extent GTEFL has such information, it is confidential and proprietary.

19. Please identify the specific number of customer and access lines served by fiber distribution facilities as of 12/31/99.

**OBJECTION:**

GTEFL objects to this Interrogatory because it seeks historical information that is irrelevant to this proceeding, which is intended to establish rates for unbundled network elements based upon long run, forward-looking cost. In addition, to the extent GTEFL has such information, it is confidential and proprietary.

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20. Please identify all specific plans for the replacement of current central office digital switches and their anticipated replacement switch type and cut-over date.

**OBJECTION:**

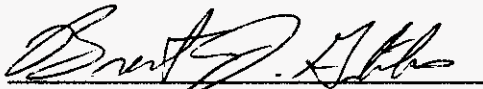
GTEFL objects to this Interrogatory because, to the extent GTEFL has any responsive data, it is proprietary and highly confidential competitive information. AT&T routinely objects to providing its own investment and planning data to its competitors on the same grounds. GTEFL cannot be expected to produce such sensitive data to AT&T. GTEFL further objects to the Interrogatory on the grounds that planning forecast information is irrelevant to selecting a long run forward-looking cost model and is not otherwise relevant to any issue in this proceeding.

21. Please provide all internal cost of capital estimates and analyses prepared and/or used by GTE over the last 24 months. Specifically, all cost of capital, cost of debt and cost of equity estimates which support such estimates that have been prepared or used by GTE or any of its departments (such as treasury and/or finance departments), divisions, subsidiaries, project teams, fictional groups, or employees for any purpose over the last 24 months, other than for regulatory proceedings (such as rate of return, TELRIC or Universal Service Fund proceedings.) Please do not provide any testimonies of expert witnesses, nor refer to the work of expert witnesses.

**OBJECTION:**

GTE objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome and seeks information that is not relevant to this proceeding, which is intended to establish rates for unbundled network elements based upon long run, forward-looking cost.

Respectfully submitted,



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