

ORIGINAL



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Kimberly Caswell  
Counsel

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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Enclosures

A part of GTE Corporation

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of unbundled network elements )  
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Docket No. 990649-TP  
Filed: May 24, 2000

**GTE FLORIDA INCORPORATED'S OBJECTIONS TO AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

GTE Florida Incorporated ("GTEFL"), by counsel and pursuant to the procedural order in this docket (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 Request for Production of Documents. GTEFL reserves the right to make additional and/or more complete objections when it files its responses to AT&T's First Set of Document Requests.

**GENERAL OBJECTIONS**

GTEFL generally objects to AT&T's First Set of Document Requests 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 document requests to the extent they seek 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

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to be a waiver of any applicable privilege with respect to such document or to the 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 document requests to the extent they seek production of documents or disclosure of 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 document requests to the extent they are unduly burdensome, vague, ambiguous, overbroad, annoying, harassing or fail to specify clearly the documents requested. Moreover, GTEFL objects to these requests to the extent that they seek information that is obtainable from some other source that is more convenient, less burdensome, or less expensive.

5. GTEFL objects to AT&T's document requests to the extent they purport to impose on GTE greater obligations than those imposed by the Florida Rules of Civil Procedure.

6. GTEFL objects to AT&T's document requests to the extent they require 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 Request for Production of Documents will be made subject to, qualified by, and without waiver of each of the foregoing General Objections and the following Specific Objections.

## DOCUMENT REQUESTS

GTEFL specifically objects to AT&T's First Request for Production of Documents as follows:

1. Please provide copy of the latest earnings or surveillance report filed with Florida Public Service Commission.

### OBJECTION:

GTEFL objects to this Request on the grounds that any earnings or surveillance reports GTEFL has been required to file are publicly available and easily obtainable by AT&T.

2. Please provide all relevant documentation to support GTE's response to AT&T's First Interrogatory No. 6.

3. Please provide copies of 1990-1999 ARMIS 43-07 reports for Florida.

### OBJECTION:

GTE objects to these requests on the grounds that they are unduly burdensome. ARMIS reports are publicly available and easily obtainable by AT&T. Furthermore, GTEFL objects to this Request on the grounds it is overbroad in that it seeks information prior to 1998. Such historical data is not relevant to selecting a cost model to determine the long run forward-looking cost of providing unbundled network elements.

4. Please provide a copy of latest "Average Life Indications Based on Full Mortality Study" for each account.

5. Please provide all tables and schedules ordinarily required by the FCC in a Depreciation Study.

**OBJECTION:**

GTEFL objects to this Request on the grounds that it is overbroad and unduly burdensome.

6. Please provide all electronic transfer data to prepare a complete Florida Depreciation Study as of January 1, 2000.

**OBJECTION:**

GTEFL objects to this Request on the grounds that it is overbroad and unduly burdensome

7. Provide "worm charts" for each account plotting the life indications consistent with FCC banding requirements.

**OBJECTION:**

GTEFL objects to this Request on the grounds that it is overbroad and unduly burdensome

8. Provide all substitution and life cycle analyses prepared in support of the Depreciation Study.

**OBJECTION:**

GTEFL objects to this Request on the grounds that it is overbroad and unduly burdensome.

9. Please provide all company plans underlying the Company's proposed lives and net salvage values.

**OBJECTION:**

GTEFL objects to this Request on the grounds that it is overbroad and unduly burdensome.

10. Please provide any studies available comparing GTE Florida's provision of advanced services to any other LECs' provision of advanced services.

**OBJECTION:**

GTEFL objects to this Request on the grounds that it is overbroad, unduly burdensome and seeks information that is confidential and proprietary to GTEFL.

11. Please provide a copy of the Company's most recent Business Plan and/or underlying workpapers identifying the projected investment additions and retirements in Florida by depreciable plant account or category for the years 2000 to 2004.

**OBJECTION:**

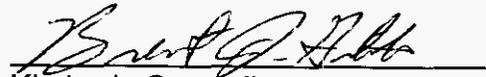
GTEFL objects to this Request on the grounds that it is overbroad, unduly burdensome and seeks information that is confidential and proprietary to GTEFL. AT&T routinely objects to providing its own investment and planning data to its competitors on the same grounds. GTEFL cannot be expected to produce such sensitive data to AT&T.

12. Please provide all supporting workpapers, memoranda or other documents in relation to AT&T's First Interrogatory No. 22.

**OBJECTION:**

GTEFL objects to this Request on the grounds that it is vague and ambiguous in that AT&T has not propounded an Interrogatory No. 22.

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Objections to AT&T Communications of the Southern States, Inc.'s First Request for Production of Documents and First Set of Interrogatories in Docket No. 990649-TP were sent via facsimile and overnight mail(\*) on May 24, 2000 and U.S. mail on May 25, 2000 to the parties on the attached list.

  
\_\_\_\_\_  
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