

LAW OFFICES

SHOOK, HARDY & BACON LLP

KANSAS CITY
OVERLAND PARK
HOUSTON
SAN FRANCISCO
MIAMI

HAMILTON SQUARE
600 14TH STREET, NW, SUITE 800
WASHINGTON, D.C. 20005-2004
TELEPHONE (202) 783-8400 ■ FACSIMILE (202) 783-4211

LONDON
ZURICH
GENEVA
MELBOURNE
BUENOS AIRES

Rodney L. Joyce
(202) 639-5602
rjoyce@shb.com

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RECORDS AND REPORTING

June 20, 2000

Via Federal Express

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

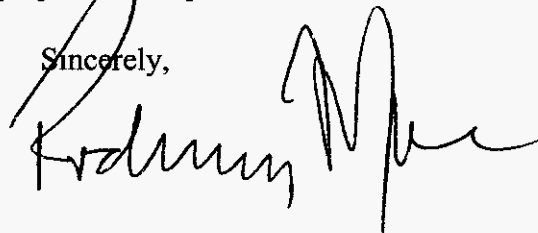
Re: Docket No. 990649-TP (Investigation into Pricing of Unbundled Network Elements)

Dear Ms. Bayo:

Enclosed for filing is an original and 15 copies of "Objections of Network Access Solutions Corporation to GTE Florida Incorporated's First Set of Interrogatories." Service has been made as indicated on the Certificate of Service.

Please stamp the extra copy to indicate the filing date and return the stamped copy to me in the enclosed, self-addressed and prepaid envelope.

Sincerely,



Rodney L. Joyce
Counsel for Network Access Solutions Corporation

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Enclosures

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BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In re:)
)
Investigation Into Pricing of Unbundled) Docket No. 990649-TP
Network Elements) Filed June 21, 2000
)

**OBJECTIONS OF NETWORK ACCESS SOLUTIONS CORPORATION
TO GTE FLORIDA INCORPORATED'S FIRST SET OF INTERROGATORIES**

Pursuant to Rule 28-106.206 of the Florida Administrative Code and Rule 1.340, 1.350 and 1.280(b) of the Florida Rules of Civil Procedure, Network Access Solutions Corp. ("NAS") makes the following objections to the First Set of Interrogatories ("Interrogatories") submitted by GTE Florida Incorporated ("GTE").

General Objections

1. NAS objects to GTE's Interrogatories to the extent they seek information which is irrelevant to the subject matter of this proceeding.
2. NAS objects to GTE's Interrogatories to the extent they seek information that is not reasonably calculated to lead to the discovery of admissible evidence.
3. NAS objects to GTE's Interrogatories to the extent they require the production of information which is exempt from discovery by virtue of the attorney-client, work product, or other privilege.
4. NAS objects to GTE's Interrogatories insofar as they are vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for purposes of the Interrogatories.

5. NAS objects to GTE's Interrogatories insofar as they require the production of information which is already publicly available and to which GTE has easy access.

6. NAS objects to GTE's Interrogatories to the extent they require the production of information that is strictly proprietary, competitively sensitive, confidential, or constitutes trade secrets.

7. NAS objects to GTE's Interrogatories, instructions, and definitions, insofar as they seek to impose obligations on NAS that exceed the requirements of applicable law.

8. NAS objects to GTE's Interrogatories to the extent they seek the production of information which is not generally maintained by NAS in the ordinary course of business.

Specific Objections

GTE No. 1: Please provide, by account, the depreciation lives and salvage values that NAS uses to depreciate its plant and equipment.

Objection. NAS objects to this Interrogatory because it seeks information which is irrelevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. NAS also objects to this Interrogatory because it uses terms that are vague, ambiguous, overly broad, or imprecise. NAS also objects to this Interrogatory because it requires the production of information that constitutes trade secrets or is proprietary, confidential or competitively sensitive.

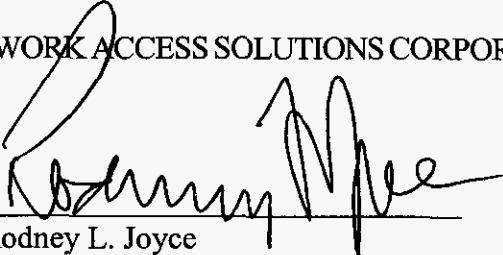
GTE No. 2: Please provide the depreciation rate that NAS applies to each of its plant and equipment accounts.

Objection. NAS objects to this Interrogatory because it seeks information which is irrelevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. NAS also objects to this Interrogatory because it uses terms that

are vague, ambiguous, overly broad, or imprecise. NAS also objects to this Interrogatory because it requires the production of information that constitutes trade secrets or is proprietary, confidential or competitively sensitive.

Respectfully submitted,

NETWORK ACCESS SOLUTIONS CORPORATION

By: 

Rodney L. Joyce
Shook, Hardy & Bacon, L.L.P.
600 14th Street, N.W., Suite 800
Washington, D.C. 20005-2004
(202) 639-5602 (telephone)
(202) 783-4211 (facsimile)
rjoyce@shb.com (e-mail)
Its Attorneys

Dated: June 20, 2000

CERTIFICATE OF SERVICE

I hereby certify that a copy of "Objections of Network Access Solutions Corporation to GTE Florida Incorporated's First Set of Interrogatories" was sent by overnight delivery on June 20, 2000 to Kimberly Caswell of GTE at the address listed below and by U.S. Mail on June 20, 2000 to the other parties listed below.

Kimberly Caswell
GTE Service Corporation
One Tampa City Center
201 North Franklin Street
Tampa, FL 33602

Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

BellSouth Telecommunications
Nancy B. White
c/o Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556

MCI WorldCom Inc.
Donna Canzano McNulty
325 John Knox Road, Suite 105
Tallahassee, FL 32303-4131

Time Warner Telecom
Carolyn Marek
Regulatory Affairs, Southeast Region
233 Bramerton Court
Franklin, TN 37069

Intermedia Communications Inc.
Scott Sapperstein
3625 Queen Palm Drive
Tampa, FL 33619-1309

Bruce May
Holland Law Firm
315 S. Calhoun Street, Suite 600
Tallahassee, FL 32301

Charles Rehwinkel
Sprint-Florida
1313 Blairstone Road
MC FLTLHO0107
Tallahassee, FL 32301

Pennington Law Firm
Peter Dunbar
Karen M. Camechis
215 S. Monroe St., 2nd Floor
Tallahassee, FL 32301

Florida Cable Telecom. Assoc.
Michael A. Gross
310 N. Monroe Street
Tallahassee, FL 32301

Jon C. Moyle, Jr.
Cathy M. Sellers
Moyle Flanigan et al.
The Perkins House
118 N. Gadsden Street
Tallahassee, FL 32301

Joseph McGlothlin
McWhirter Reeves Law Firm
117 S. Gadsden Street
Tallahassee, FL 32301

Richard D. Melson
Gabriel E. Nieto
Hopping Law Firm
123 S. Calhoun Street
Tallahassee, FL 32314

Mark Buechele
Supra Telecommunications
Koger Center-Ellis Building
1311 Executive Center Dr., Suite 200
Tallahassee, FL 32301-5027

Glenn Harris
Northpoint Comm. Inc.
222 Sutter Street, 7th Floor
San Francisco, CA 94108

AT&T
Marsha Rule
101 N. Monroe Street, Suite 700
Tallahassee, FL 32301-1549

Florida Public Tele. Assoc.
Angela Green
125 S. Gadsden Street #200
Tallahassee, FL 32301-1525

Messer Law Firm
Floyd Self
215 S. Monroe St., Suite 701
Tallahassee, FL 32301

Charles J. Beck
Office of Public Counsel
111 W. Madison Street, Rm. 812
Tallahassee, FL 32399-1400

Elise Kiely
Jeffrey Blumenfeld
Blumenfeld & Cohen
1625 Massachusetts Avenue, N.W., Suite 300
Washington, DC 20036

Catherine F. Boone
Covad Comm. Co.
10 Glenlake Pky, Suite 650
Atlanta, GA 30328-3495

Gregory J. Darnell
MCI WorldCom Inc.
Six Concourse Pky., Suite 3200
Atlanta, GA 30328

Bettye Willis
Alltel Comm. Services Inc.
One Allied Drive
Little Rock, AR 72203-2177

Vicki Gordon Kaufman
McWhirter Reeves Law Firm
117 S. Gadsden Street
Tallahassee, FL 32301

George S. Ford
Chief Economist
Z-Tel Communications Inc.
601 S. Harbour Island Blvd.
Tampa, FL 33602

Russell M. Blau
Marc B. Rothschild
Swidler Berlin Law Firm
3000 K Street, N.W., Suite 300
Washington, DC 20007-5116

Eric J. Branfman
Morton J. Posner
Swidler Berlin Law Firm
3000 K Street, N.W., Suite 300
Washington, DC 20007-5116

J. Jeffrey Wahlen
Ausley & McMullen
227 S. Calhoun Street
Tallahassee, FL 32302

BlueStar Networks, Inc.
Norton Cutler
Michael Bressman
401 Church Street, 24th Floor
Nashville, TN 37201


Jonathan E. Canis
Michael B. Hazzard
Kelley Drye & Warren
1200 19th Street, NW, 5th Floor
Washington, DC 20036

John Spilman
Broadslate Networks Inc.
675 Peter Jefferson Pky, Suite 310
Charlottesville, VA 22911

John McLaughlin
KMC Telecom Inc.
3025 Breckenridge Blvd., Suite 170
Duluth, GA 30096

ACI Corp.
7337 S. Revere Parkway
Englewood, CO 80112

Constance L. Kirkendall
@link Network, Inc.
2220 Campbell Creek Blvd., Suite 110
Richardson, TX 75082-4420

A handwritten signature in black ink, appearing to read "Rodney L. Joyce", written over a horizontal line.

Rodney L. Joyce