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NEW YORK OFFICE  
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June 22, 2000

**VIA FEDERAL EXPRESS**

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

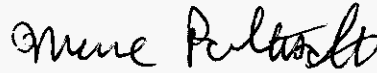
Re: @Link Networks, Inc.'s Response to GTEFL's First  
Set of Interrogatories in Docket No. 990649-TP

Dear Ms. Bayo:

Enclosed please find one original and fifteen copies of @Link Networks, Inc.'s Response to GTEFL's First Set of Interrogatories in Docket No. 990649-TP. Please date stamp and return the extra copy to us in the enclosed self addressed, postage paid envelope.

Please feel free to contact me if you have any questions or require further information.

Sincerely,

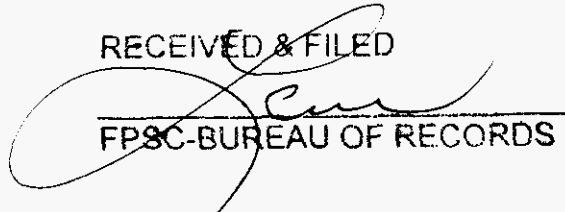


Marc B. Rothschild  
Counsel for @Link Networks, Inc.

Enclosures

cc: Constance L. Kirkendall  
Dana Hoyle

APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP 3  
COM 5  
CTR \_\_\_\_\_  
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DOCUMENT NUMBER-DATE  
07677 JUN 23 8  
FPSC-RECORDS/REPORTING



BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into Pricing of )  
Unbundled Network Elements )  
\_\_\_\_\_ )

Docket No. 990649-TP

Filed: June 22, 2000

**@LINK NETWORKS, INC.'S  
RESPONSE TO GTE FLORIDA INCORPORATED'S  
FIRST SET OF INTERROGATORIES**

@Link Networks, Inc. (“@Link”), pursuant to Rules 25-22.034 and 25-22.035 of the Florida Administrative Code and Rules 1.350 and 1.280(b) of the Florida Rules of Civil Procedure, hereby submits the following Responses to GTE Florida Incorporated’s (“GTE”) First Set of Interrogatories to @Link Networks, Inc.

**GENERAL OBJECTIONS**

1. @Link objects to each interrogatory to the extent that any response would require the inclusion of information protected by the attorney-client privilege, the work product doctrine, the joint defense privilege or any other discovery privilege recognized under the Florida Rules of Civil Procedure or other applicable Florida law.

2. @Link objects to each interrogatory to the extent it seeks disclosure of trade secrets, confidential, or competitively confidential information. @Link will only produce such information if required by law and upon the execution of an acceptable Confidentiality Agreement and/or Protective Order providing, among other things, that such information shall be used solely for purposes of these proceedings, and that access and distribution of such information will be strictly limited to those needing access for the purposes of these proceedings.

3. @Link objects to GTE instructions as unduly burdensome and overly broad because they appear to require @Link to provide more information than might otherwise be

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required by law. @Link will perform only those obligations required under Florida law related to the identification of privileged information.

4. @Link objects to GTE data requests to the extent they seek information or documents that are not relevant to the subject matter of this proceeding and are not reasonably calculated to lead to the discovery of admissible evidence.

5. @Link objects to the definition of “@Link” to the extent that the definition seeks to impose an obligation on @Link to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such definition is overly broad, unduly burdensome and not permitted by applicable discovery rules. Without waiver of its general objections, and subject to other specific objections, responses will be provided on behalf of @Link Networks, Inc., which is the ALEC certificated to provide regulated telecommunications services in Florida and which is a party to this docket.

6. @Link’s specific objections and responses are set forth on the following pages.

### **INTERROGATORIES**

Subject to, and without waiver of, the foregoing general objections, @Link enters the following responses to GTE’s interrogatories:

#### **Interrogatory No. 1:**

Please provide, by account, the depreciation lives and salvage values that @Link uses to depreciate its plant and equipment.

#### **Response:**

@Link objects to this data request because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. FCC regulation 51.505 states that the total element long-run incremental cost (TELRIC) of an element should be measured based on the *ILEC’s forward looking costs*. Thus, the depreciation

lives and salvage values that an ALEC such as @Link uses to depreciate its plant and equipment are irrelevant.

**Interrogatory No. 2:**

Please provide the depreciation rate that @Link applies to each of its plant and equipment accounts.

**Response:**

@Link objects to this data request because it seeks information not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence. FCC regulation 51.505 states that the TELRIC of an element should be measured based on *the ILEC's forward looking costs*. Thus, the depreciation rate that an ALEC such as @Link applies to each of its plant and equipment accounts is irrelevant.

Respectfully submitted the 22<sup>nd</sup> day of June, 2000.



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Counsel for @Link Networks, Inc.

## CERTIFICATE OF SERVICE

I, Robert Ridings, HEREBY CERTIFY that on the 22<sup>nd</sup> day of June, 2000, a copy of the foregoing Objections of @Link Networks, Inc. to the First Set of Interrogatories of GTE in Docket No. 990649-TP was served, via first-class mail, on the following parties:

- @link Networks, Inc.  
Constance Kirkendall  
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- Broadslate Networks of Florida, Inc.  
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- Holland Law Firm  
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Fax: (850) 422-2586
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*Represents: GNAPs*

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*Represents: Time Warner Telecom of Florida, L.P.*

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