

**ORIGINAL**

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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: Broadslate Networks of Florida, 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 Broadslate Networks of Florida, 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 Broadslate Networks of Florida, Inc.

Enclosures

cc: John Spilman

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

4. Broadslate 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. Broadslate objects to the definition of “Broadslate” to the extent that the definition seeks to impose an obligation on Broadslate 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 Broadslate Networks of Florida, Inc., which is the ALEC certificated to provide regulated telecommunications services in Florida and which is a party to this docket.

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

### **INTERROGATORIES**

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

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

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

#### **Response:**

Broadslate 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 Broadslate uses to depreciate its plant and equipment are irrelevant.

**Interrogatory No. 2:**

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

**Response:**

Broadslate 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 Broadslate applies to each of its plant and equipment accounts is irrelevant.

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



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Counsel for  
Broadslate Networks of Florida, 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 Broadslate Networks of Florida, 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.  
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- ACI Corp.  
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*Represents: GNAPs*

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Robert J. Ridings