

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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RECORDS AND REPORTING

Initiation of Show Cause Proceeding)
Against GTE Communications)
Corporation for Apparent Violation of)
Rule 25-4.118, F.A.C., Local, Local)
Toll, or Toll Provider Selection.)
_____)

Docket 990362-TI
Filed: June 23, 2000

CITIZENS' SECOND SET OF INTERROGATORIES TO GTE

Florida's Citizens' ("Citizens"), by and through Jack Shreve, Public Counsel, propound the following interrogatories to GTE Communications Corporation and GTE Service Corporation (collectively "GTE") to be answered under oath in full accordance with Rules 25-22.34 and 25-22.35, Florida Administrative Code, and Rule 1.340, Florida Rules of Civil Procedure. All answers must be served upon the attorneys for the Citizens by Tuesday, July 25, 2000.

Each interrogatory should be answered based upon your knowledge and information or belief, and any answer based upon information and belief should state that it is given on such basis. If the complete answer to an interrogatory is not known, so state and answer as fully as possible the part of the interrogatory to which an

answer is known. For each answer, or part thereof, please identify the individual or individuals who provided the information or helped in providing the information contained in the responses.

- APP _____
- CAP _____
- CMP _____
- COM _____
- CTR _____
- ECR _____
- LEG _____
- OPC _____
- PAI _____
- RCO _____
- SEC I
- SER _____
- OTH _____

Max
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
07684 JUN 23 8
FPSC-RECORDS/REPORTING

This to serve as Notice of Service

DEFINITIONS

1. The term "referring or relating to" means any oral, graphic, demonstrative, telephonic, verbal, electronic (including e-mail), written or other conveyance of information, including but not limited to conversations, telecommunications, and documents.

2. The term "GTE" encompasses both GTE Communications Corporation (GTECC) and GTE Service Corporation, together with their officers, employees, consultants, agents, representatives, attorneys, and any other person or entity acting on behalf of either GTE Communications Corporation or GTE Service Corporation.

3. As used herein the terms "you," "your," and "company" encompasses both GTE Communications Corporation and GTE Service Corporation, together with their officers, employees, consultants, agents, representatives, attorneys, and any other person or entity acting on behalf of either GTE Communications Corporation or GTE Service Corporation.

INSTRUCTIONS

1 These discovery requests are to be answered with reference to all information in your possession, custody or control, or reasonably available to you. The requests are intended to include requests for information which is physically within GTE's possession, custody or control, as well as in possession, custody or control of GTE's agents, attorneys, or other third parties from which such documents may be obtained.

2. Please construe "and" as well as "or" either disjunctively or conjunctively as necessary to bring within the scope of this production of documents any document which might otherwise be construed to be outside the scope.

3. Words in the past tense include the present, and words in the present tense include the past. Use of the singular includes the plural, and use of the masculine includes the feminine where appropriate, and vice versa.

INTERROGATORIES

5. Please provide a chronological list of all business actions taken as a result of the review of Snyder Direct Services, Inc., forwarded to Mr. Thomas R. Parker on May 11, 1998 (see documents at bate stamp 17456 *et. seq.*)

6. This interrogatory relates to the "Customer Relations Reports" found at bates stamps 15739 through 16266. Please provide the name, current business address, and current business position of the person or persons making handwritten notations on these documents. Please provide the date or dates when the notations were made and state the purpose of making the handwritten notations.

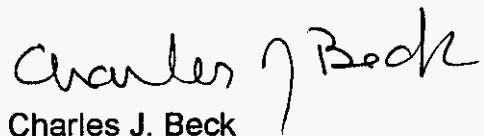
7. Please provide the date on which you terminated the services of Snyder as sales agents for GTECC.

8. Please list the attendees at the meeting held on October 7, 1998, covering Snyder overview & quality (see bates stamp page 17137) and provide the business affiliation of each attendee.

9. Please describe whether the complaints listed on bates stamp pages 17342 through 17375 and 17416 through 17417 relate only to PSC complaints, whether it includes other governmental bodies, and whether it includes complaints received by GTECC that were not filed with any government agency.

10. For each month from January, 1998, through the present, please provide the number of complaints you received about long distance slamming or unauthorized PIC change from customers in Florida where the complaint was received from a source other than the Florida Public Service Commission. Please separate the number of

complaints between the number received from governmental entities other than the Florida Public Service Commission and those received by you directly from customers.



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**DOCKET NO. 990362-TI
CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S.

Mail or hand-delivery to the following parties on this 23rd day of June, 2000.



Charles J. Beck

Lee Fordham
Division of Legal Services
Fla. Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Kimberly Caswell
GTE Florida Incorporated
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110

D. Bruce May, Jr.
Holland & Knight, LLP
315 South Calhoun Street
P.O. Drawer 810
Tallahassee, FL 32302-0810

AFFIDAVIT

STATE OF _____

COUNTY OF _____

BEFORE ME, the undersigned authority, personally appeared _____,
who deposed and stated that he/she provided the answers to interrogatories _____
_____ served on _____ by _____ on _____ and that
the responses are true and correct to the best of his/her information and belief.

DATED at _____, _____, this day of _____,
2000.

Sworn to and subscribed before me this _____ day of _____, 2000.

NOTARY PUBLIC

State of _____ at Large

My Commission Expires: _____