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July 7, 2000

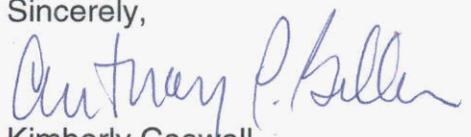
Ms. Blanca S. Bayo, Director
Division of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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's Second Request for Production of Documents (No. 13). 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,

for 
Kimberly Caswell

KC:tas
Enclosures

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Investigation into pricing of unbundled network elements)
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)

Docket No. 990649-TP
Filed: July 7, 2000

GTE FLORIDA INCORPORATED'S OBJECTIONS TO AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 13)

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 objections to AT&T Communications of the Southern States, Inc. ("AT&T") Second Request for Production of Documents.

GENERAL OBJECTIONS

GTEFL generally objects to AT&T's Second Set of Document Requests as follows:

1. GTEFL objects to AT&T's discovery because it has been filed out of time. AT&T's discovery pertains to a cost of capital issue to be litigated in hearing number 1, to be held from July 17-19. Under the procedural order in this docket, all discovery for that hearing is to be completed by July 10. (Order No. PSC-00-0540-PCO-TP, at 2-3.) AT&T's Second Set of Document Requests was served on June 28. Responses are due 20 days from that date, on July 18. Because the response date is eight days past the discovery cut-off, GTEFL is not required to respond to these Document Requests. Therefore, GTEFL does not intend to file any further objections or responses.

2. GTEFL objects to AT&T's definition of "GTE" to the extent it includes "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

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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.

3. 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 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.

4. 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.

5. 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.

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

7. 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.

Respectfully submitted,

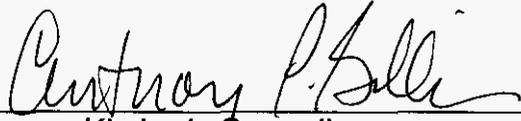

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Objections to AT&T's Second Request for Production of Documents (No. 13) in Docket No. 990649-TP were sent via overnight mail(*) on July 6, 2000 and U.S. mail on July 7, 2000 to the parties on the attached list.



gar Kimberly Caswell

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