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July 12, 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 Covad Communications Company's First Set of Interrogatories and First Request for Production of Documents. 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,

Kimberly Caswell

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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 12 , 2000

**GTE FLORIDA INCORPORATED'S OBJECTIONS TO
COVAD COMMUNICATIONS COMPANY'S
FIRST SET OF INTERROGATORIES AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

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 initial objections to Covad Communications Company's ("Covad") First Set of Interrogatories and First Request for Production of Documents. GTEFL reserves the right to make additional and/or more complete objections when it files its final objections and responses to Covad's discovery requests.

GENERAL OBJECTIONS

GTEFL generally objects to Covad's First Set of Interrogatories and First Request for Production of Documents as follows:

1. GTEFL objects to Covad's discovery 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,

DOCUMENT NUMBER-DATE
08443 JUL 12 8
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without prejudice to any claim of privilege, in the event any such document is inadvertently produced.

2. GTEFL objects to Covad's interrogatories and 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 to the discovery of admissible evidence.
3. GTEFL objects to Covad's interrogatories and 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.
4. GTEFL objects to Covad's interrogatories and document requests to the extent they purport to impose on GTEFL greater obligations than those imposed by the Florida Rules of Civil Procedure.
5. GTEFL objects to Covad's interrogatories and 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.
6. GTEFL's later responses to Covad's First Set of Interrogatories and First Request for Production of Documents will be made subject to, qualified by, and without waiver of each of the foregoing General Objections.
7. GTEFL objects to Covad's interrogatories and document requests to the extent that they seek information relating to hearing number 1, which is to be held July

17-19, 2000. Under the procedural order in this case, discovery for that hearing was to be completed by July 10, 2000. (Order PSC-00-0540-PCO-TP, March 16, 2000.) GTEFL's answers to Covad's discovery are not due until July 24, well past the discovery cut-off for the July hearing. Therefore, GTEFL will not respond to any item seeking information relative to this first hearing.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Objections to Covad Communications Company's First Set of Interrogatories and First Request for Production of Documents in Docket No. 990649-TP were sent via overnight mail(*) on July 11, 2000 and U.S. mail on July 12, 2000 to the parties on the attached list.



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