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ORIGINAL

January 9, 2001

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RECORDS AND REPORTING

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

Re: Docket No. 990362-TI

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket is the original and 15 copies of Citizens' Motion for Leave to File Supplemental Direct Testimony. Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Sincerely,

Charles J. Beck
Deputy Public Counsel

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Initiation of Show Cause Proceeding) Docket 990362-TI
Against GTE Communications)
Corporation for Apparent Violation of)
Rule 25-4.118, F.A.C., Local, Local)
Toll, or Toll Provider Selection.) Filed: January 9, 2001
_____)

CITIZENS' MOTION FOR LEAVE TO FILE SUPPLEMENTAL DIRECT TESTIMONY

The Citizens of Florida (Citizens), by and through Jack Shreve, Public Counsel, file this motion seeking leave to file supplemental direct testimony. In support, Citizens state the following:

1. On January 24, 2000 -- almost one year ago -- Citizens served our first set of requests for production of documents to GTE. Request number two of that set asked the following: Please provide all work papers, correspondence and other documents in your possession, custody or control relating to complaints you received from January 1, 1997, through the present where the customer complained that they were switched to GTECC as a presubscribed local, local-toll or toll provider without the customer's consent. This request relates to all such complaints you received from any source, including but not limited to complaints received from the Florida Public Service Commission, complaints received from the Federal Communications

Commission, complaints received from other government agencies, and complaints you received directly from customers.

2. Responses to that request were due on February 28, 2000.

3. Citizens made a number of inquiries to GTE questioning whether their response to this request included all of their non-PSC complaints. GTE assured Citizens that they had checked and re-checked with everyone who should know about such documents, and there were no more non-psc complaints.

4. On July 14, 2000, Citizens served the same request again in order to get any responsive documents that might have been created since the previous request. Request for production of documents number 15 asked the following: "Please provide all work papers, correspondence and other documents in your possession, custody or control relating to complaints you received from January 1, 1997, through July 11, 2000, where the customer complained that they were switched to GTECC as a presubscribed local, local-toll or toll provider without the customer's consent. This request relates to all such complaints you received from any source, including but not limited to complaints received from the Florida Public Service Commission, complaints received from the Federal Communications Commission, complaints received from other government agencies, and complaints you received directly from

customers. Documents previously provided in this proceeding need not be provided again."

5. Responses to that request were due on August 18, 2000.

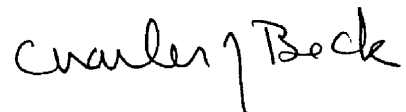
6. On the due date for our direct testimony of December 15, 2000, Verizon provided 1780 pages of additional documents responsive to the January 24, 2000, and July 14, 2000, requests for production of documents. All of the documents predated the January 24, 2000, request, and most were individual pages with unique customer slamming complaints.

7. These documents should have been provided on February 28, 2000, instead of on the due date for direct testimony. Importantly, the contents of these documents support the contention made in our direct testimony that the slamming complaints received by the Commission represent only the tip of the iceberg of slamming complaints against GTE.

8. Citizens request leave to file supplemental direct testimony by R. Earl Poucher to introduce and discuss these documents. Verizon's production of these documents more than nine months after they should have been produced prevented Citizens from including information about the documents in our testimony filed on December 15, 2000.

9. Verizon does not object to our filing supplemental direct testimony at this time to the extent that the testimony relates to the documents produced on December 15, 2000. However, Verizon reserves the right to make any other objections it may have to the testimony.

WHEREFORE, the Citizens respectfully request the Prehearing Officer to grant leave to file supplemental direct testimony by R. Earl Poucher.

A handwritten signature in black ink that reads "Charles J. Beck". The signature is written in a cursive style with a large, stylized "C" and "B".

Charles J. Beck
Deputy Public Counsel
Fla. Bar. No. 217281

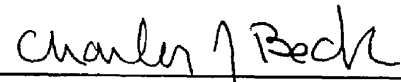
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Attorneys for the Citizens
of Florida

**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 9th day of January,
2001.



Charles J. Beck

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

Kimberly Caswell
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Tampa, FL 33601-0110