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May 4, 2001

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

Re: Docket No. 991376-TL
Initiation of Show Cause Proceedings against Verizon Florida Inc. for
Apparent Violation of Service Standards

Dear Ms. Bayo:

Please find enclosed for filing an original and one copy of Verizon Florida Inc.'s Notice of Service of Responses to Citizens' Fifth Set of Interrogatories in the above matter. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this matter, please contact me at 813-483-2617.

Sincerely,

Kimberly Caswell

KC:tas
Enclosures

- APP _____
- CAF _____
- CMP _____
- COM _____
- CTR _____
- ECR _____
- LEG _____
- OPC _____
- PAI _____
- RGO _____
- SEC
- SFR _____
- OTH _____

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

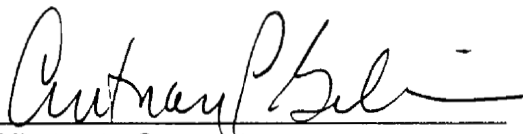
In re: Initiation of Show Cause)
Proceedings against Verizon Florida) Docket No. 991376-TL
Inc. for Apparent Violation of Service) Filed: May 4, 2001
Standards)
_____)

**NOTICE OF SERVICE OF VERIZON FLORIDA INC.'S
RESPONSES TO CITIZENS' FIFTH SET OF INTERROGATORIES**

NOTICE IS HEREBY GIVEN that a true and correct copy of Verizon Florida Inc.'s (formerly, GTE Florida Incorporated) Responses to Citizens' Fourth Set of Interrogatories, which were legally propounded by Citizens on March 30, 2001, were sent via overnight delivery on May 3, 2001, to Charles J. Beck, Deputy Public Counsel, Office of Public Counsel, 111 W. Madison Street, Room 812, Tallahassee, FL 32399-1400.

The original and one copy of this Notice were also sent via overnight delivery on May 3, 2001 to the Director, Division of Records & Reporting, at the Commission. Further service on other parties of record is as set forth on the Certificate of Service, appended hereto.

Respectfully submitted on May 4, 2001.

By: 
to Kimberly Caswell
Post Office Box 110, FLTC0007
Tampa, Florida 33601
Telephone: 813-483-2617

Attorney for Verizon Florida Inc.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Initiation of show cause)
proceedings against Verizon Florida) Docket No. 991376-TL
Inc. for apparent violation of service)
standards)

Verizon Florida Inc.'s Responses to Citizens'
Fifth Set of Interrogatories (Nos. 10-17)

Provide the name, address and relationship to the Company of each person providing
answers to the following inquiries and identify which question(s) each person answered.

Questions 10-17:

Russell Diamond
Business Analysis Manager - Florida Region
201 North Franklin Street
Tampa, FL 33602

INTERROGATORIES

10. How many labor hours, including overtime and temporary employees, were
charged by Verizon employees and contractors for Verizon labor groups 201 and
301, stated separately, for each of the years 1996, 1997, 1998 and 1999, stated
separately?

Response:

Table with 5 columns: Category, 1996, 1997, 1998, 1999. Rows: Labor Group 201, Labor Group 301, Contractor 209.

11. Please identify any significant work functions that were added or deleted from the
responsibilities of the Verizon labor groups 201 and 301 between January 1,
1996 and December 31, 1999 that would have significantly impacted the budget.

Response:

No significant functions have been added or taken away from these labor groups.

12. What was the actual average headcount for the employees included in the
Verizon labor groups 201 and 301, stated separately, for each of the years 1996,
1997, 1998 and 1999? (For purposes of this interrogatory, the average

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

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headcount should include the full time equivalent employees, including overtime, temporary employees and contract labor used to perform the work functions contained within the labor group 201 and 301 responsibilities).

Response:

As defined for purposes of this interrogatory, the headcounts in groups 201 and 301 were as follows:

	<u>1996</u>	<u>1997</u>	<u>1998</u>	<u>1999</u>
Labor Group 201				
Labor Group 301				

13. What was the actual year end headcount for Verizon's labor group 201 employees on the payroll as of December 31, 1995, 1996, 1997, 1998 and 1999?

Response:

	<u>1995</u>	<u>1996</u>	<u>1997</u>	<u>1998</u>	<u>1999</u>
Labor Group 201					
Labor Group 301					

Data are not available for year-end 1995. However, the documents provided in response to item 43 of Citizens' Fifth Set of Requests for Production of Documents contain information on headcount for the end of January 1996.

14. What was the actual year end headcount for Verizon's labor group 301 employees on the payroll as of December 31, 1995, 1996, 1997, 1998 and 1999?

Response:

See response to number 13.

15. What were the actual year end headcount of temporary and contract employees, stated separately, on Verizon's payroll who performed job functions of Verizon labor groups 201 and 301 as of December 31, 1995, 1996, 1997, 1998 and 1999?

Response:

	<u>1995</u>	<u>1996</u>	<u>1997</u>	<u>1998</u>	<u>1999</u>
Contractor					

Data are not available for 1995.

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16. Please state the work functions contained within the job description of Verizon labor group 201.

Response:

CZT 201 & 301 - Service Order Activities:

1. Customer contact.
 - Upon arrival
 - Upon completion
 - Ensure customer satisfaction
2. Facilities procurement and verification.
 - Facilities changes
 - Facilities records updates
3. Installation of service to the Network Interface Device (NID).
 - Terminal activity
 - Network premise wire activity
 - Drop activity
 - Protector activity
4. Inside wire and jacks work.
 - Reallocation of existing wires and jacks for multiple lines
 - Installation of wire and jacks
5. Completion of work assignment.
 - Upload completed job
 - Download next job assignment

CZT 201 – Repair Activities:

6. Isolation of trouble at the Network Interface Device to locate and repair faults at:
 - Central office equipment
 - Network facilities
 - Network premise wire and/or NID
 - Inside wire and jacks for accounts with inside wire maintenance or billing when appropriate

17. Please state the work functions contained within the job description of Verizon labor group 301.

Response:

See response to number 16.

VERIFICATION


STATE OF FLORIDA)
) ss.
COUNTY OF HILLSBOROUGH)

BEFORE ME, the undersigned authority, personally appeared Michelle A. Robinson, who deposed and stated that the answers to the Fifth Set of Interrogatories (Nos. 10-17) served on Verizon Florida Inc. by Citizens in Docket No. 991376-TL were prepared at her request and she is informed that the responses contained therein are true and correct to the best of her information and belief.

DATED at Tampa, Florida, this 3 day of May, 2001.

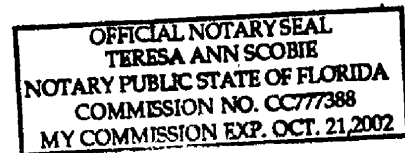

Michelle A. Robinson

Sworn to and subscribed before me this 3d day of May, 2001.


Notary Public
State of Florida

Name Typed or Printed/Commission No.

My Commission Expires:

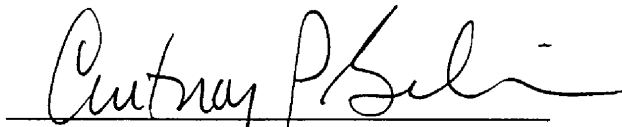


CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Notice of Service and Responses to Citizens' Fifth Set of Interrogatories in Docket No. 991376-TL were sent via overnight delivery on May 3, 2001 to:

Lee Fordham, Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Charles J. Beck, Deputy Public Counsel
Office of Public Counsel
111 W. Madison Street, Room 812
Tallahassee, FL 32399-1400



Kimberly Caswell