

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the cost of providing)
basic local telecommunications service,)
pursuant to Section 364.025, Florida Statutes)

Docket No. 980696-TP

Filed: August 13, 1998

**GTE FLORIDA INCORPORATED'S RESPONSES AND OBJECTIONS TO
AT&T'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (17-21)**

17. Please provide all documents and any other supporting data related to your response to AT&T's Interrogatory No. 47.

Response:

Please refer to GTEFL's objection to AT&T's Interrogatory No. 47.

18. Please provide all documents and other supporting data related to the ICM modeling assumption that all copper feeder cable in the 16-grid area around the wire center is underground conduit.

Response:

GTEFL objects to this Request because it does not seek any information relevant to this proceeding, nor is it calculated to lead to the discovery of any relevant and otherwise admissible information. GTEFL has not filed ICM in this docket. Therefore, there is no reason for AT&T to ask questions about it.

19. Please provide the source documentation for the percentage of structure mix by wire center for feeder and distribution.

Response:

Please refer to Bates stamped documents 220 through 224. The information contained in the attachment is confidential in nature and is being provided in accordance with the terms of the nondisclosure agreement previously executed by AT&T.

DOCUMENT NUMBER-DATE

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- g) Square lots (as opposed to rectangular lots)
- h) Outside of the 16-grid block around the wire center that the fiber feeder routes diverge with no sharing of structure
- i) Most copper lengths should be restricted to under 12,000 feet
- j) Copper feeder cables placed in the 16-grid area around the wire center are all underground.
- k) All drops have buried material and placement costs
- l) There is a terminal for every four residences and businesses.
- m) That drops go to the center of the lot.
- n) There appears to be no difference in unit costs or factors from the highest to the lowest customer density areas (e.g., the percent concrete is the same in rural and urban areas)
- o) The current percentage mix of plant structure should be adjusted to reflect increasing amount of out-of-sight plant (buried or underground) cable placements
- p) The ILEC and power company should share equally in the cost of a joint use pole
- q) The minimum number of lots per grid is 25
- r) If (NumOfSegs >0.0); then nodes:=21

Response:

GTEFL objects to this Request because it does not seek any information relevant to this proceeding, nor is it calculated to lead to the discovery of any relevant and otherwise admissible information. GTEFL has not filed ICM in this docket. Therefore, there is no reason for AT&T to ask questions about it.