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BEFORE THE

FLORIDA PUBLIC SERVICE COMMISSION

RECORDS AND REPORTING

In Re: Investigation into Pricing of Unbundled Network Elements)

Docket No. 990649-TP)

COVAD COMMUNICATIONS COMPANY'S RESPONSES TO GTE FLORIDA INCORPORATED'S FIRST SET OF INTERROGATORIES (NOS. 1-2)

COMES NOW DIECA Communications, Inc., d/b/a Covad Communications Company ("Covad"), by counsel and pursuant to the procedural order in this case (Order No. PSC-00-0540-PCO-TP), hereby files its Responses to GTE Florida Incorporated's First Set of Interrogatories.

INTERROGATORY NO. 1

Please provide, by account, the depreciation lives and salvage values that Covad uses to depreciate its plant and equipment.

OBJECTION

Covad objects to this Interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. FCC Rule 51.505 states that the total element long-run incremental cost (TELRIC) of an element should be based on the ILEC's forward-looking costs. Thus, the depreciation lives and salvage values that an ALEC such as Covad uses to depreciate its plant and equipment are irrelevant. Furthermore, Covad objects to this Interrogatory to the

extent that it seeks information regarding affiliates of Covad, not certificated or doing business in the State of Florida. Covad further objects on the grounds that this Interrogatory is unduly burdensome and oppressive.

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INTERROGATORY NO. 2

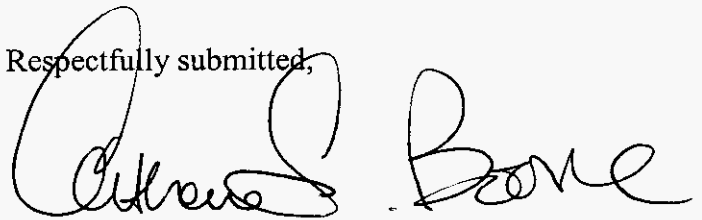
Please provide the depreciation rate that Covad applies to each of its plant and equipment accounts.

RESPONSE

Covad objects to this Interrogatory on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. FCC Rule 51.505 states that the total element long-run incremental cost (TELRIC) of an element should be based on the ILEC's forward-looking costs. Thus, the depreciation lives and salvage values that an ALEC such as Covad uses to depreciate its plant and equipment are irrelevant. Furthermore, Covad objects to this Interrogatory to the extent that it seeks information regarding affiliates of Covad, not certificated or doing business in the State of Florida. Covad further objects on the grounds that this Interrogatory is unduly burdensome and oppressive.

Dated: June 26, 2000

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Catherine F. Boone". The signature is written in a cursive style with a large initial "C" and "B".

Catherine F. Boone, Esq.
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CERTIFICATE OF SERVICE

I do hereby certify that I have this 26th day of June, 2000 served a true and correct copy of the foregoing via overnight delivery* and/or United States Mail to the following parties of record:

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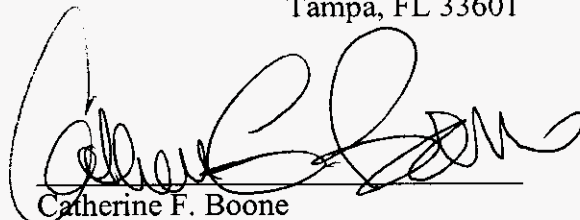
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