



**GTE SERVICE CORPORATION**

One Tampa City Center  
201 North Franklin Street (33602)  
Post Office Box 110, FLTC0007  
Tampa, Florida 33601-0110  
813-483-2606  
813-204-8870 (Facsimile)

Marceil Morrell\*  
Assistant Vice President &  
Associate General Counsel-East Area

Anthony P. Gillman\*  
Assistant General Counsel

Florida Region Counsel\*\*  
Kimberly Caswell  
M. Eric Edgington  
Ernesto Mayor, Jr.  
Elizabeth Biemer Sanchez

\* Certified in Florida as Authorized House Counsel  
\*\* Licensed in Florida

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

October 5, 1998

Re: Docket No. 980733-TL  
Discovery for Study on Fair & Reasonable Rates and on Relationships  
Among Costs and Charges Associated with Certain Telecommunications  
Services Provided by LECs, as Required by Chapter 98-277

Dear Ms. Bayo:

Please find enclosed an original and fifteen copies of GTE Florida Incorporated's  
Objections to Staff's Second Request for Production of Documents (No. 2) and First Set  
of Interrogatories (1-7) for filing in the above matter. 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*

Kimberly Caswell

RECEIVED & FILED

*[Signature]*  
FPSC-BUREAU OF RECORDS

- ACK \_\_\_\_\_
- AFA   I
- APP \_\_\_\_\_
- CAF   BW
- CMU   \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG   I
- LIN \_\_\_\_\_
- OPC \_\_\_\_\_
- RCH   I
- SEC   I
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

\* part of GTE Corporation

DOCUMENT NUMBER-DATE

10924 OCT-5 98

FPSC-RECORDS/REPORTING

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Discovery related to study on )  
fair and reasonable rates and on )  
relationships among costs and charges )  
associated with certain )  
telecommunications services provided )  
by local exchange companies (LECs), )  
as required by Chapter 98-277, Laws )  
of Florida )

---

Docket No. 980733-TL  
Filed: October 5, 1998

**GTE FLORIDA'S OBJECTIONS TO  
STAFF'S SECOND REQUEST FOR PRODUCTION OF  
DOCUMENTS (NO. 2) AND FIRST SET OF INTERROGATORIES (1-7)**

GTE Florida Incorporated (GTEFL) files its preliminary objections to the Staff's Second Request for Production of Documents and First Set of Interrogatories served upon GTEFL. GTEFL reserves the right to make additional objections when it files its responses to Staff's discovery, as these additional objections may be discovered in the process of gathering information to respond to the Request.

**GENERAL OBJECTIONS**

Each of the general objections set forth below is incorporated into each of the specific responses and objections.

1. GTEFL objects to the discovery requests to the extent that they seek information from GTEFL's affiliates, parents, subsidiaries, agents, or any other entities that are not GTEFL. The purpose of this proceeding, set forth by statute, is to determine a fair and reasonable rate for basic residential service and to examine the cost-charge relationships among designated services provided by local exchange carriers. Only GTEFL's costs and associated information are relevant to this purpose. GTEFL will thus respond to Staff's discovery only on behalf of GTEFL.
2. GTEFL objects to Staff's discovery to the extent that it seeks 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, without prejudice to any claim of privilege, in the event any such document is inadvertently produced.

DOCUMENT NUMBER-DATE

10924 OCT-5 88

FLORIDA PUBLIC SERVICE COMMISSION

3. GTEFL's later responses to these document requests will be made subject to, qualified by, and made without waiver of each of the foregoing general objections.

**SPECIFIC OBJECTIONS**

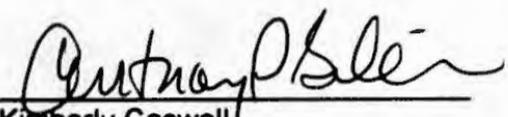
**Requests for Production**

**Item 2:** GTEFL interprets this request to seek only the information in the designated FCC filing that pertains to Florida. To the extent that the request seeks information pertaining to other states, GTEFL objects because such information is not relevant to any issue in this proceeding, which is intended to determine a fair and reasonable residential basic rate in Florida. Furthermore, the complete FCC filing is very voluminous. Therefore, a request for the entire filing would be unduly burdensome, as well as irrelevant.

Respectfully submitted on October 5, 1998.

By:

*Kimberly Caswell*

  
Kimberly Caswell

Post Office Box 110, FLTC0007

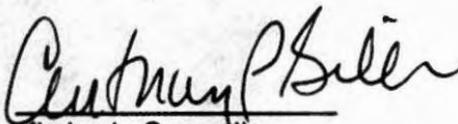
Tampa, Florida 33601

Telephone: 813-483-2617

Attorney for GTE Florida Incorporated

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Objections to Staff's Second Request for Production of Documents (No. 2) and First Set of Interrogatories (1-7) in Docket No. 980733-TL were sent via overnight mail on October 2, 1998(\*) and U.S. mail on October 5, 1998 to the parties on the attached list.

  
Kimberly Caswell

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

Office of Public Counsel  
c/o The Florida Legislature  
111 W. Madison Street  
Room 812  
Tallahassee, FL 32399-1400

Michael A. Gross  
Assistant Attorney General  
Office of the Attorney General  
PL-01 The Capitol  
Tallahassee, FL 32399-1050

David B. Erwin  
Attorney-At-Law  
127 Riversink Road  
Crawfordville, FL 32327

Charles Rehwinkel  
Sprint-Florida Inc.  
1313 Blair Stone Road  
MC FLTH00107  
Tallahassee, FL 32301

Nancy White  
BellSouth Telecomm. Inc.  
150 S. Monroe Street  
Suite 400  
Tallahassee, FL 32301-1556

Jeff Wahlen/John Fons  
Ausley & McMullen  
227 S. Calhoun Street  
Tallahassee, FL 32301

Tracy Hatch/Marsha Rule  
AT&T  
101 N. Monroe Street, #700  
Tallahassee, FL 32301

Richard Melson  
Hopping Law Firm  
P. O. Box 6526  
Tallahassee, FL 32314

Peter Dunbar/Barbara Auger  
Pennington Law Firm  
P. O. Box 10095  
Tallahassee, FL 32302

Thomas Bond  
MCI Telecomm. Corp.  
780 Johnson Ferry Rd., #700  
Atlanta, GA 30342

Donna Canzano  
Wiggins & Villacorta  
P. O. Drawer 1657  
Tallahassee, FL 32302

Ben Fincher/Monica Barone  
Sprint  
3100 Cumberland Circle  
Atlanta, GA 30339

Floyd R. Self  
Norman H. Horton, Jr.  
Messer Law Firm  
215 S. Monroe Street, Suite 701  
Tallahassee, FL 32301-1876

Ed Paschall  
AARP  
1923 Atapha Nene  
Tallahassee, FL 32301-5850

C. Everett Boyd  
Ervin Law Firm  
P. O. Drawer 1170  
Tallahassee, FL 32302

Monte Belote  
6801 Seaview Way  
Tampa, FL 33615

Laura L. Gallagher  
Florida Cable Tele. Assn.  
310 N. Monroe Street  
Tallahassee, FL 32301

Lynne G. Brewer  
Northeast Florida Tel. Co.  
P. O. Box 485  
Macclenny, FL 32063-0485

Harriet Eudy  
ALLTEL Florida, Inc.  
P. O. Box 550  
Live Oak, FL 32060

Bill Huttenhower  
Vista-United Telecomm.  
P. O. Box 10180  
Lake Buena Vista, FL 32830

Robert M. Post, Jr.  
P. O. Box 277  
Indiantown, FL 34956

Tom McCabe  
P. O. Box 189  
Quincy, FL 32353-0189

Mark Ellmer/Bill Thomas  
P. O. Box 220  
502 Fifth Street  
Port St. Joe, FL 32456

Kelly Goodnight  
Frontier Communications  
180 S. Clinton Avenue  
Rochester, NY 14646

Steve Brown  
Intermedia Comm. Inc.  
3625 Queen Palm Drive  
Tampa, FL 33619-1309

Kenneth A. Hoffman  
John R. Ellis  
Rutledge Law Firm  
P. O. Box 551  
Tallahassee, FL 32301

Angela Green  
Fla. Public Telecomm Assn.  
125 S. Gadsden Street  
Suite 200  
Tallahassee, FL 32301-1525

Susan Langston  
FTIA  
Box 1776  
Tallahassee, FL 32302-1776

Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter Law Firm  
117 S. Gadsden Street  
Tallahassee, FL 32301

Ben Ochshorn  
Florida Legal Services  
2121 Delta Boulevard  
Tallahassee, FL 32303

Julie S. Myers  
Smith, Bryan & Myers  
311 E. Park Avenue  
Tallahassee, FL 32301

Patricia Greene  
Holland & Knight  
315 S. Calhoun Street  
Suite 600  
Tallahassee, FL 32301

Michael Twomey  
Route 28, Box 1264  
Tallahassee, FL 32310

Richard L. Spears  
Community Assoc. Institute  
Florida Legislative Alliance  
9132 Ridge Pine Trail  
Orlando, FL 32819

John Guthrie/  
Susan Masterson  
Senate Committee on  
Regulated Industries  
418 Senate Office Building  
Tallahassee, FL 32399-1300

Charlie Murphy  
Booter Imhof  
House Committee on  
Utilities Communications  
428 House Office Building  
Tallahassee, FL 32399-1300

David Daniel  
House Democratic Office  
316, The Capitol  
402 S. Monroe Street  
Tallahassee, FL 32399-1300

Alexis Muellner  
Associate Editor  
South Fla. Business Journal  
1320 S. Dixie Highway  
Coral Gables, FL 33146

Frankie Callen, V.P.  
Greater Orlando Assoc. of  
Realtors  
P. O. Box 587  
Orlando, FL 32802

Debra K. Mink, President  
Leg. Chair, BOMA Florida  
Mink & Mink, Inc.  
3081 East Commercial Blvd.  
Ft. Lauderdale, FL 33308

Gene Adams  
Florida Assoc. of Realtors  
P. O. Box 1853  
Tallahassee, FL 32302-1853

John L. Brewerton, III, P.A.  
250 N. Orange Avenue  
Suite 1700  
Orlando, FL 32801

Chris Keena  
Compass Mgmt. & Leasing  
1801 Hermitage Boulevard  
Suite 130  
Tallahassee, FL 32308

David M. Frank, Esq.  
1403 Maclay Commerce Drive  
Suite 3  
Tallahassee, FL 32312

Susan Weinstock  
AARP-State Legis. Dept.  
601 E Street N.W.  
Washington, DC 20049