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August 4, 1998

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

Re: Docket No. 980696-TP
Determination of the cost of basic local telecommunications service,
pursuant to Section 364.025, Florida Statutes

Dear Ms. Bayo:

Please find enclosed for filing an original and fifteen copies of GTE Florida Incorporated's Objections to Florida Cable Telecommunications Association's Second Request for Production of Documents in the above matter. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing,

ACK ✓
AFA 2 please contact me at (813) 483-2617.

APP — Very truly yours,

CAF —
CMU *Ernesto Mayor Jr*

CTR — Kimberly Caswell

EAG —

LEG 2 KC:tas

LIN 5 Enclosures

OPC —

RCH —

SEC 1

WAS — A part of GTE Corporation

OTH —

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

08221 AUG-4 88

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the cost of providing)	Docket No. 980696-TL
basic local telecommunications service,)	
pursuant to Section 364.025, Florida Statutes)	Filed: August 4, 1998
_____)	

**GTE FLORIDA INCORPORATED'S OBJECTIONS TO
FLORIDA CABLE TELECOMMUNICATIONS ASSOCIATION'S
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS**

GTE Florida Incorporated (GTEFL) hereby files its preliminary objections to FCTA's Second Request for Production of Documents. GTEFL reserves the right to make additional objections to FCTA's Second Request for Production of Documents when GTEFL files its responses to those Requests.

GENERAL OBJECTIONS

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

1. GTE Florida Incorporated (GTEFL) objects to FCTA's definition of "GTE" to the extent it includes GTEFL's "agents," "servants" and "representatives." The meaning of "servants" and "representatives" is vague and unduly broad. FCTA's definition could be interpreted to extend to numerous entities beyond GTEFL itself. The purpose of this proceeding, as set forth in the Florida Statutes, is to choose a proxy model to determine the forward-looking cost of basic local telecommunications service. Only GTEFL's costs and associated information are relevant to this purpose. GTEFL will thus respond to FCTA's discovery only on behalf of GTEFL.
2. GTEFL objects to FCTA's discovery to the extent that it seeks information which is obtainable from some other source that is more convenient, less burdensome, or less expensive.
3. GTEFL objects to FCTA'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

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FPSC-RECORDS/REPORTING

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

SPECIFIC OBJECTIONS

- 3) Please provide all documents and supporting workpapers that have been prepared or used by GTE or any of its divisions, subsidiaries, project teams, functional groups, consultants or employees related to your responses to FCTA's First Set of Interrogatories Nos. 1-7.

Objection to Production of Documents Request No. 3:

GTE Florida objected to FCTA's First Set of Interrogatories Numbers 1-7 to the extent they related to ICM. GTEFL makes that same objection here. GTEFL has not filed ICM in this docket, and so all of FCTA's questions about it are irrelevant to any issue in this proceeding.

- 4) Please provide GTE's annual surveillance reports submitted to the Florida Public Service Commission for the years 1995, 1996, and 1997.

Objection to Production of Documents Request No. 4:

GTEFL filed no surveillance reports for 1996 or 1997. With regard to 1995, GTEFL objects to this request because it asks for publicly filed data which FCTA can easily obtain itself from the Florida Public Service Commission. Expecting GTEFL to instead produce this information is thus unreasonable and burdensome. Information from 1995 is, moreover, irrelevant to the Florida legislative directive to choose a cost proxy model for universal service support purposes.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Objections to Florida Cable Telecommunications Association's Second Request for Production of Documents in Docket No. 980696-TP were sent via U.S. mail on August 4, 1998 to the parties on the attached list.

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