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FLORIDA PUBLIC
SERVICE COMMISSION



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August 12, 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 AT&T's Third 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, please contact me at (813) 483-2617.

Very truly yours,

ACK _____
AFA 2 *Anthony P. Gillman*

APP _____
CAF _____
Kimberly Caswell

CMU 1 KC:tas

CTR _____
Enclosures

EAG _____

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A part of GTE Corporation

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DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 98036-TP
Filed: August 12, 1998

**GTE FLORIDA INCORPORATED'S OBJECTIONS TO
AT&T'S THIRD REQUEST FOR PRODUCTION OF DOCUMENTS (22-32)**

GTE Florida Incorporated (GTEFL) files its preliminary objections to the Third Request for Production of Documents served upon GTEFL by AT&T Communications of the Southern States, Inc. (AT&T). GTEFL reserves the right to make additional and/or more complete objections when it files its responses to AT&T's Third Request for Production of Documents.

GENERAL OBJECTIONS

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

1. GTEFL objects to AT&T's definition of "GTE" to the extent it includes GTEFL's affiliates, parents, subsidiaries, agents, representatives, and all other entities that are not GTEFL. The purpose of this proceeding, as set forth in Florida Statutes section 364.025(4)(b), 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 AT&T's discovery only on behalf of GTEFL.
2. GTEFL objects to AT&T'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 AT&T'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 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

Objection to Document Request 22: GTEFL objects to this Request to the extent it seeks confidential and proprietary information—information that is proprietary to both GTEFL and to GTEFL's third-party vendors. Public disclosure of such information could adversely affect these vendors' relationships with their actual and potential clients.

Objection to Document Request 24: GTEFL objects to this Document Request to the extent it would require GTEFL to produce information about prices and associated information in its third-party vendor contracts. Such information is considered by GTEFL's vendors as highly competitively sensitive; its public disclosure would adversely affect these vendors' relationships with actual and potential clients.

Objection to Document Request 25: GTEFL objects to this Document Request to the extent it would require GTEFL to produce third-party vendor contracts. These contracts are considered by GTEFL's vendors to be highly confidential and competitively sensitive; their public disclosure would adversely affect these vendors' relationships with actual and potential clients.

Objection to Document Request 26: GTEFL objects to this Document Request to the extent it would require GTEFL to produce confidential and proprietary information.

Objection to Document Request 28: GTEFL objects to this Document Request to the extent it would require GTEFL to produce confidential and proprietary information.

Objection to Document Request 29: GTEFL objects to this Interrogatory to the extent that it seeks information earlier than 1997. Such information is not relevant to determining the forward-looking cost of providing basic local service, and its production would be unduly burdensome. GTEFL objects, in addition, to the extent this Interrogatory would require GTEFL to produce information about prices and associated information in its third-party vendor contracts. Such information is considered by GTEFL's vendors as highly competitively sensitive; its public disclosure would adversely affect these vendors' relationships with actual and potential clients.

Objection to Document Request 30: GTEFL objects to this Interrogatory to the extent it seeks price and other terms of GTEFL's contracts with its third-party vendors. These vendors consider such information to be highly competitively sensitive. Its public disclosure could adversely affect vendors' relationships with actual and potential clients.

Objection to Document Request 31: GTEFL objects to this Interrogatory to the extent it seeks price and other terms of GTEFL's contracts with its third-party vendors. These vendors consider such information to be highly competitively sensitive. Its public disclosure could adversely affect vendors' relationships with actual and potential clients.

Objection to Document Request 32: GTEFL objects to this Interrogatory to the extent it seeks price and other terms of GTEFL's contracts with its third-party vendors. These vendors consider such information to be highly competitively sensitive. Its public disclosure could adversely affect vendors' relationships with actual and potential clients.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Objections to AT&T's Third Request for Production of Documents in Docket No. 980696-TP were sent via overnight delivery(*) or U.S. mail on August 12, 1998 to the parties on the attached list.

Kimberly Caswell
Per Kimberly Caswell

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