

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-TL
Filed: August 13, 1998

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

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.

Response:

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. Notwithstanding this objection, GTE is producing the document entitled Florida Switched and Special Access Line Inventory (pages 1 through 133) in association with its response to interrogatory number 4. This information is confidential and is being produced in accordance with the nondisclosure agreement previously executed by FCTA.

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

Response:

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.

DOCUMENT NUMBER-DATE

08741-AUG 17 88

FPSC RECORDS REPORTING

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of Production of Documents
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5. Please provide GTE's Annual Report to Shareholders for the years 1995, 1996 and 1997.

Response:

There are no responsive documents because GTEFL does not prepare Annual Reports to Shareholders.