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Tracy Hatch Attorney

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September 8, 1998

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

Re: Docket No. 980696-TP

Dear Mrs. Bayo:

IH:kfj Enclosures

cc: Parties of Record

Enclosed for filing please find an original and fifteen (15) copies each of AT&T's Notice of Serving Its Answers, Objections, and Motion for Protective Order With Respect to GTE Florida, Incorporated's First Set of Interrogatories and AT&T's Notice of Serving Its Responses, Objections, and Motion for Protective Order With Respect to GTE Florida, Incorporated's First Request for Production of Documents. These responses were served via overnight delivery to GTE Florida, Incorporated on September 1, 1998 and through inadvertent circumstances are hereby filed with the Commission and all pages of record.

In addition, please note that AT&T's Notice of Serving Its Responses, Objections and Motion for Protective Order With Respect to GTE Florida, Incorporated's Second Request for Production of Documents, filed September 4, 1998, were incorrectly labeled as AT&T's Responses, Objections and Motion for Protective Order With Respect GTE Florida, Incorporated's First Request for Production of Documents. We apologize for any inconvenience this error may have caused.

ACK	inconvenience this error may have caused.		
AFA		Copies of the foregoing are being served on the parties of record in accordance with the	
APP	- atta	attached certificate of service.	
CAF			
CMU		Thank you for your assistance with this matter.	
CTR		RECEIVED & FILED Yours truly,	
EAG		FPSC-BUREAU OF RECORDS Tracy Hatch Tracy Hatch	
LEG			
LIN		Tracy Hatch	
OPC			

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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. 980696-TL) Filed: September 8, 1998

AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.'S NOTICE OF SERVING ITS RESPONSES, OBJECTIONS, AND MOTION FOR PROTECTIVE ORDER WITH RESPECT TO GTE FLORIDA, INCORPORATED'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

AT&T Communications of the Southern States, (hereinafter "AT&T"), by and through its undersigned attorney, hereby files this Notice of Serving its Responses, Objections, and Motion for Protective Order with Respect to GTE Florida, Incorporated's First Request for Production of Documents on this 8th day of September, 1998.

Respectfully submitted,

Tracy Hatch

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(850) 425-6361 (fax)

ATTORNEY FOR AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.

DOCUMENT HUMBER-DATE

U979 | SEP-85

CERTIFICATE OF SERVICE DOCKET 980696-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via U.S. Mail to the following parties of record on this 8th day of September, 1998:

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