

MARY JO PEED
General Attorney

Southern Bell Telephone
and Telegraph Company
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(404) 529-7208

April 18, 1994

Mr. Steve C. Tribble
Director, Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

RE: Docket No. 921074-TP

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company's Amended Objections and Responses to IAC's First Request for Production of Documents to be filed in the above mentioned docket for the Commission's consideration.

A copy of this letter is enclosed. Please indicate on the copy that the original was filed and return the copy to me. Thank you for your assistance in this matter.

Very truly yours,

Mary Jo Peed
Mary Jo Peed (APL)

- ACK
- AFM 2
- APL _____
- CSE _____
- CSM _____
- CTP _____

Enclosure

- cc: H. R. Anthony
- A. M. Lombardo
- R. Douglas Lackey
- All Parties of Record
- _____
- _____
- _____
- _____
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- _____

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DIVISION OF RECORDS AND REPORTING

CERTIFICATE OF SERVICE
Docket No. 921074-TP

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 18TH day of April, 1994,
to:

Tracy Hatch
Division of Communications
Florida Public Service
Commission
101 East Gaines Street
Tallahassee, FL 32399-0866

Thomas Parker
GTE Florida Incorporated
P.O. Box 110
MC 616
Tampa, FL 33601-0110

Charles Murphy
Division of Legal Services
Florida Public Service
Commission
101 East Gaines Street
Tallahassee, FL 32301

C. Dean Kurtz
Central Telephone Company of
Florida
Post Office Box 2214
Tallahassee, Florida 32316-
2214

Patrick K. Wiggins
Wiggins & Villacorta, P.A.
Post Office Drawer 1657
Tallahassee, Florida 32302

Lee L. Willis
Ausley, McMullen, McGehee
Carothers & Proctor
Post Office Box 391
Tallahassee, Florida 32302

Intermedia Communications
Suite 270
9280 Bay Plaza Boulevard
Tampa, FL 33619-4453

Florida Cable Television
Association, Inc.
310 N. Monroe Street
Tallahassee, FL 32301

Charles J. Beck
Deputy Public Counsel
Office of the Public Counsel
111 W. Madison Street
Room 812
Tallahassee, FL 32399-1400

Brad E. Mutschelknaus
Wiley, Rein, & Fielding
1776 K Street, NW
Washington, D.C. 20006
atty for Interexchange
Access Coalition

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Grandoff and Reeves
Suite 716
315 South Calhoun Street
Tallahassee, FL 32301
atty for FIXCA

Joseph P. Gillan
J. P. Gillan and Associates
Post Office Box 541038
Orlando, FL 32854-1038

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs, Odom &
Ervin
305 South Gadsden Street
Tallahassee, FL 32301

Chanthina R. Bryant
Sprint
3065 Cumberland Circle
Atlanta, GA 30339

Peter M. Dunbar, Esq.
David L. Swafford,
Haben, Culpepper, Dunbar
& French, P.A.
Post Office Box 10095
Tallahassee, FL 32302

Paul Jones, Esq.
Time Warner Cable
Corporate Headquarters
300 First Stamford Place
Stamford, CT 06902-6732

Michael W. Tye
Suite 1410
106 East College Avenue
Tallahassee, FL
atty. for AT&T

Harriet Eudy
ALLTEL Florida, Inc.
Post Office Box 550
Live Oak, FL 32060

David B. Erwin
Young, van Assenderp,
Varnadoe & Benton, P.A.
225 South Adams Street
Suite 200
Post Office Box 1833
Tallahassee, FL 32302

Charles Dennis
Indiantown Telephone System
Post Office Box 277
Indiantown, Florida 34956

John A. Carroll, Jr.
Northeast Telephone Company
Post Office Box 485
Macclenny, Florida 32063-0485

Daniel V. Gregory
Quincy Telephone Company
Post Office Box 189
Quincy, Florida 32351

Jeff McGehee
Southland Telephone Company
210 Brookwood Road
Post Office Box 37
Atmore, Alabama 36504

Jodie L. Donovan
Regulatory Counsel
Teleport Communications Group
Inc., Ste. 301
1 Teleport Drive
Staten Island, NY 10311

F. Ben Poag
United Telephone Company of FL
P.O. Box 165000
Altamonte Springs, FL 32716

Lee L. Willis
John P. Fons
Ausley, McMullen, McGehee,
Carothers & Proctor
Post Office Box 391
Tallahassee, FL 32302

Mary Jo Reed

(M)

BEFORE
THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Expanded Interconnection) DOCKET NO. 921074-TP
Phase II and Local Transport)
Restructure)
_____) APRIL 18, 1994

**BELLSOUTH TELECOMMUNICATIONS, INC. D/B/A
SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
AMENDED OBJECTIONS AND RESPONSES TO IAC'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

COMES NOW, BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company") and files pursuant to Rule 25-22.04, Florida Administrative Code and Rule 1.350, Florida Rules of Civil Procedure, its Amended Objections and Responses to IAC's First Request for Production of Documents dated February 23, 1994.

1. On March 30, 1994, Southern Bell filed its original Objections and Responses to IAC's First Request for Production of Documents.

2. Southern Bell now substitutes the following response and objection to IAC's Request No. 22.

26. In response to Request No. 22, Southern Bell objects to portions of this request on the grounds that the documents requested contain proprietary confidential business information which is commercially valuable to Southern Bell. Southern Bell will produce the responsive documents in its possession, custody or control at a mutually convenient time and place, subject to IAC's execution of an appropriate confidentiality agreement.

3. The original response and objection found in paragraph 26 of Southern Bell's pleading filed March 30, 1994, should be deleted in its entirety.

RECEIVED DATE
03596 APR 18 1994
FLORIDA PUBLIC SERVICE COMMISSION

Respectfully submitted this 18th day of April, 1994.

ATTORNEYS FOR
BELLSOUTH TELECOMMUNICATIONS, INC.
d/b/a SOUTHERN BELL TELEPHONE AND
TELEGRAPH COMPANY

Harris R. Anthony (pm)

HARRIS R. ANTHONY
J. PHILLIP CARVER
c/o Marshall M. Criser, III
Suite 400
150 South Monroe
Tallahassee, Florida 32301
(305) 347-5555

Mary Jo Feed (pm)

MARY JO FEED
675 West Peachtree Street, NE
4300 Southern Bell Center
Atlanta, Georgia 30375
(404) 529-7208