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**ORIGINAL
FILE COPY**

May 22, 1992

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

RE: Docket No. 920260-TL

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Response and Objections to Staff's First Request for Production of Documents and Notice of Intent to Request Specified Confidential Classification which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served on the parties shown on the attached Certificate of Service.

Sincerely yours,

Nancy B. White
Nancy B. White

- ACK _____
- AFA 1
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG 1
- LIN 6
- GPC _____
- RCH _____
- SEC 1
- WAS _____
- DTH _____

Enclosures

cc: All Parties of Record
A. M. Lombardo
H. R. Anthony
R. D. Lackey

RECEIVED & FILED

J. J.
EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
05327 MAY 26 1992
EPSC-RECORDS/REPORTING

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**CERTIFICATE OF SERVICE
Docket No. 920260-TL**

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 22nd day of May, 1992 to:

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

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

Angela Green
Division of Legal Services
Florida Public Svc. Commission
101 East Gaines Street
Tallahassee, FL 32399-0863

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


Harris R. Anthony

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of)	Docket No. 920260-TL
the Revenue Requirements and Rate)	
Stabilization Plan of Southern)	Filed: May 22, 1992
Bell Telephone and Telegraph)	
Company (Formerly FPSC Docket)	
Number 880069-TL))	
)	

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
RESPONSE AND OBJECTIONS TO STAFF'S FIRST
REQUEST FOR PRODUCTION OF DOCUMENTS AND NOTICE OF
INTENT TO REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATION

COMES NOW BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), and files, (1) pursuant to Rule 25-22.034, Florida Administrative Code, and Rules 1.280(c) and 1.350 of the Florida Rules of Civil Procedure, its Responses and Objections to the Florida Public Service Commission Staff's ("Staff") First Request for Production of Documents dated April 17, 1992, and (2) pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, its Notice of Intent to Request Confidential Classification.

NOTICE OF INTENT TO REQUEST
SPECIFIED CONFIDENTIAL CLASSIFICATION

Some of the document that will be delivered to and reviewed by the Staff in response to its First Request for Production of Documents contain information which is exempted from disclosure pursuant to Section 119.07, Florida Statutes. Specifically, a number of the documents reflect information relating to competitive interests. Because these documents contain exempt information, Southern Bell is filing this Notice of Intent to Request Confidential Classification, pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, in order to allow the

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FPSC-RECORDS/REPORTING

Staff to take possession of the documents without delay. The original of this Notice has been filed with the Division of Records and Reporting, and a copy has been served on the division requesting the information. The written staff request, its First Request for Production of Documents, has already been filed with the Division of Records and Reporting.

SPECIFIC RESPONSES TO STAFF'S FIRST
REQUEST FOR PRODUCTION OF DOCUMENTS

1. In response to Request No. 1, Southern Bell will provide the requested information for inspection and copying at a mutually agreeable time and place.

2. In response to Request No. 2, Southern Bell will provide the requested information for inspection and copying at a mutually agreeable time and place.

3. In response to Request No. 3, Southern Bell will provide the requested information for inspection and copying at a mutually agreeable time and place.

4. In response to Request No. 4, Southern Bell will provide the requested information for inspection and copying at a mutually agreeable time and place.

5. In response to Request No. 5, Southern Bell will provide the requested information for inspection and copying at a mutually agreeable time and place.

6. In response to Request No. 6, Southern Bell will provide the requested information for inspection and copying at a mutually agreeable time and place. Southern Bell further notes that the documents provided entitled "Financial Planning

Assumptions for 1992-1994" contains information relating to competitive interests and constitutes the documents which are the subject of the Notice of Intent to Request Specified Confidential Classification set forth above.

7. In response to Request No. 7, Southern Bell will provide the requested information for inspection and copying at a mutually agreeable time and place.

8. In response to Request No. 8, Southern Bell will provide the requested information for inspection and copying at a mutually agreeable time and place. Southern Bell further notes that the documents provided entitled "Financial Planning Assumptions for 1992-1994" contains information relating to competitive interests and constitutes the documents which are the subject of the Notice of Intent to Request Specified Confidential Classification set forth above.

9. In response to Request No. 9, Southern Bell will provide the requested information for inspection and copying at a mutually agreeable time and place.

10. In response to Request No. 10, Southern Bell will provide the requested information for inspection and copying at a mutually agreeable time and place.

11. In response to Request No. 11, Southern Bell will provide the requested information for inspection and copying at a mutually agreeable time and place.

12. In response to Request No. 12, Southern Bell will provide the requested information for inspection and copying at a

mutually agreeable time and place.

13. In response to Request No. 13, Southern Bell will provide the requested information for inspection and copying at a mutually agreeable time and place.

14. In response to Request No. 14, the documents requested have previously been provided to the Staff in connection with the audit being conducted in association with this docket.

15. In response to Request No. 15, Southern Bell does not create a regulated General Ledger. Southern Bell would refer the staff to the General Ledger previously provided in connection with the audit being conducted in association with this docket.

16. In response to Request No. 16, the documents requested have previously been provided to the Staff in connection with the audit being conducted in association with this docket.

Respectfully submitted this 22nd day of May, 1992.

ATTORNEYS FOR SOUTHERN BELL
TELEPHONE AND TELEGRAPH COMPANY

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R. DOUGLAS MACKAY
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