

J. Phillip Carver
General Attorney

Southern Bell Telephone
and Telegraph Company
c/o Marshall M. Criser III
Suite 400
150 So. Monroe Street
Tallahassee, Florida 32301
Phone (305) 530-5558

August 19, 1992

ORIGINAL
FILE COPY

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

Re: Docket No. 910163-TL - Repair Service Investigation

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Supplement to Response and Objections to Public Counsel's Twenty-Second Set of Request for Production of Documents and Motion for Temporary Protective Order, which we ask that you file in the captioned docket.

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

CAF

CMU

CTR

EAG

LEG wjm Enclosures

LIN cc: All Parties of Record

CHC A. M. Lombardo

ROH H. R. Anthony

SEC R. Douglas Lackey

WAS

OTH Kay

Sincerely yours,

J. Phillip Carver
J. Phillip Carver *J*

DOCUMENT NUMBER-DATE

09374 AUG 19 1992

A BELLSOUTH Company

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 910163-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 19 day of August, 1992,
to:

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

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

J. Phillip Carver sz

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition on behalf of Citizens) Docket No. 910163-TL
of the State of Florida to initiate)
investigation into integrity of) Filed: August 19, 1992
Southern Bell Telephone and Telegraph)
Company's repair service activities)
and reports.)
_____)

**SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
SUPPLEMENT TO RESPONSE AND OBJECTIONS TO PUBLIC
COUNSEL'S TWENTY-SECOND SET OF REQUESTS FOR PRODUCTION
OF DOCUMENTS AND MOTION FOR TEMPORARY PROTECTIVE ORDER**

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, Florida Rules of Civil Procedure, its Supplement to Response and Objections to the Office of Public Counsel's ("Public Counsel") Twenty-Second Request for Production of Documents dated March 25, 1992, and (2) pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, its Motion for Temporary Protective Order.

1. On March 25, 1992, Public Counsel propounded to Southern Bell the above-referenced Request to Produce. Southern Bell timely responded to that request on April 29, 1992.

2. Southern Bell has subsequently discovered that it has in its possession an additional document that is responsive to the single numbered request (including sub-parts) of the Twenty-Second Request for Production. Southern Bell, accordingly,

DOCUMENT NUMBER-DATE

09374 AUG 19 1992


FPSC-RECORDS/REPORTING


produces a copy of that document by providing it to Public Counsel by mail along with a copy of this Supplemental Response.

3. At the time of filing the original Response, Southern Bell also filed a Motion for Temporary Protective Order, which requested confidential treatment of the documents produced, and set forth the basis for that request. Inasmuch as this document is produced as a supplement to that production, it is covered by that previous motion for protective order.

Respectfully submitted,

ATTORNEYS FOR SOUTHERN BELL
TELEPHONE AND TELEGRAPH COMPANY


HARRIS R. ANTHONY *da*
J. PHILLIP CARVER
c/o Marshall M. Criser III
150 So. Monroe Street
Suite 400
Tallahassee, Florida 32301
(305) 530-5555


R. DOUGLAS LACKEY *da*
NANCY B. WHITE
4300 Southern Bell Center
675 W. Peachtree St., NE
Atlanta, Georgia 30375
(404) 529-3862