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Southern Bell Telephone
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December 9, 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 are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Response and Objections to Staff's Tenth Request for Production of Documents. Please file these documents in the above-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.

ACK _____

AFA ³ _____

APP _____

CFE _____

C Enclosures

Sincerely,

Sidney J. White, Jr.

cc: All Parties of Record

¹ A. M. Lombardo

H. R. Anthony

R. D. Lackey

C _____

REG _____

SEC 1 _____

WAS _____

OTH _____

DOCUMENT NUMBER-DATE

14303 DEC-9 1992

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of)
the Revenue Requirements and Rate) Docket No. 920260-TL
Stabilization Plan of Southern)
Bell Telephone and Telegraph) Filed: December 9, 1992
Company (Formerly FPSC Docket)
Number 880069-TL))
_____)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S RESPONSE AND
OBJECTIONS TO STAFF'S TENTH 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 25-22.034, Florida Administrative Code, its Response and Objections to Staff's Tenth Request for Production of Documents dated November 4, 1992.

GENERAL RESPONSE AND OBJECTIONS

1. Southern Bell objects to Staff's definition of "documents". Staff's definition of these terms is overly broad and is objectionable pursuant to standards adopted in Caribbean Security Systems v. Security Control Systems, Inc., 46 So. 2d 654 (Fla. App. 3rd Dist. 1986).

2. Southern Bell does not believe it was Staff's intent to require Southern Bell to produce again the same documents previously produced in other dockets, but to the extent it does, Southern Bell objects on the basis that such a request would be unduly burdensome, oppressive and unnecessary, and for these reasons is prohibited.

3. The following Specific Responses are given subject to the above-stated General Response and Objections.

DOCUMENT NUMBER-DATE

14303 DEC -9 1992

FPSC-RECORDS/REPORTING

SPECIFIC RESPONSES

4. In response to Request No. 114, Southern Bell has no documents responsive to this request. See Southern Bell's response to Staff's Thirteenth Set of Interrogatories, Item No. 365.

5. In response to Request No. 115, Southern Bell will produce responsive documents in its possession, custody, or control at a mutually convenient time and place.

6. In response to Request No. 116, Southern Bell will produce responsive documents in its possession, custody, or control at a mutually convenient time and place.

7. In response to Request No. 117, Southern Bell will produce responsive documents in its possession, custody, or control at a mutually convenient time and place.


8. In response to Request No. 118, Southern Bell will produce responsive documents in its possession, custody, or control at a mutually convenient time and place.

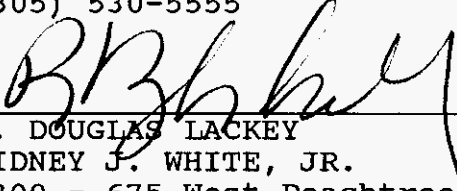
9. In response to Request No. 119, Southern Bell objects to this request on the basis that Staff has requested the Company to provide certain periodic reports for periods 1988 to the present in Lotus 1-2-3 format. However, Southern Bell has only begun submitting the referenced reports in the Lotus 1-2-3 format requested. The first such report in Lotus 1-2-3 format was the Company's Third Quarter 1992 Quality of Service filing. Prior to that time, such reports were submitted by Southern Bell in paper form only. An extensive manual effort, estimated at approximately sixteen (16) weeks for completion, would be

required to convert these already available records into the requested Lotus 1-2-3 format. Consequently, although Southern Bell does not object to producing the requested information in the form in which it was originally filed with the Commission, and in fact the Commission has such documents in its possession already, the Company does object to resubmitting previously produced public records in the new form which is now required for current and future reports of the same kind.

Respectfully submitted this 9th day of December, 1992.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY


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