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December 17, 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

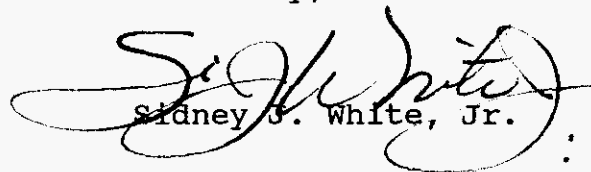
Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Response and Objections to Staff's Eleventh 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.

ACV \_\_\_\_\_  
AFA 3 \_\_\_\_\_  
APP \_\_\_\_\_  
CFE \_\_\_\_\_  
CML \_\_\_\_\_

Sincerely,


  
Sidney J. White, Jr.

CTR Enclosures

EAG cc: All Parties of Record  
LEG 1 w/m A. M. Lombardo  
LIN 6 H. R. Anthony  
R. D. Lackey

CPC \_\_\_\_\_  
EDS \_\_\_\_\_  
S 1 \_\_\_\_\_

RECEIVED & FILED

  
RECORDS DIVISION OF RECORDS

DOCUMENT NUMBER-DATE

14636 DEC 17 1992

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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 17th day of December, 1992 to:

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A handwritten signature in cursive script, appearing to read "J. G. White", with a horizontal line drawn through the middle of the signature.

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 17, 1992  
Company (Formerly FPSC Docket )  
Number 880069-TL) )  
)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
RESPONSE AND OBJECTIONS TO  
STAFF'S ELEVENTH 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 Eleventh Request for Production of Documents dated November 12, 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.

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SPECIFIC RESPONSES

4. In response to Request Nos. 120(a)-(o), Southern Bell will produce the responsive documents in its possession, custody, or control at a mutually convenient time and place.

5. In response to Request No. 121, 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. 122, Southern Bell will produce responsive documents in its possession, custody, or control at a mutually convenient time and place.

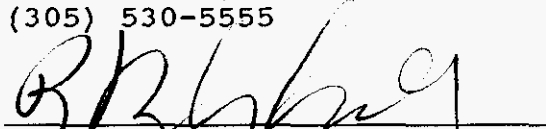
7. In response to Request No. 123, Southern Bell will produce responsive documents in its possession, custody, or control at a mutually convenient time and place.

8. In response to Request Nos. 124(a)-(gg), Southern Bell will produce responsive documents in its possession, custody, or control at a mutually convenient time and place.

Respectfully submitted this 17th day of December, 1992.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY

  
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