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February 15, 1993

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

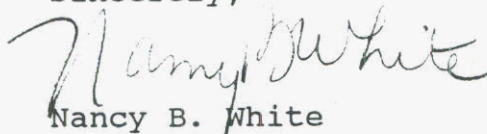
RE: Docket Nos. 920260-TL, 900960-TL, 910163-TL, 910727-TL

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Response and Objections to Public Counsel's Twenty-Sixth Request for Production of Documents and Motion for Temporary Protective Order. Please file this document in the above-captioned dockets.

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,


Nancy B. White

Enclosures

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

DOCUMENT NUMBER-DATE

01754 FEB 15 83

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE

Docket No. 920260-TL

Docket No. 900960-TL

Docket No. 910163-TL

Docket No. 910727-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this *15th* day of *Feb.*, 1993

to:

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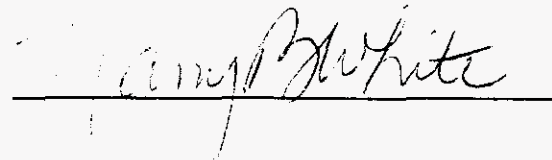
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of the Revenue Requirements and Rate Stabilization Plan of Southern Bell Telephone and Telegraph Company)	Docket No. 920260-TL
In re: Show cause proceeding against Southern Bell Telephone and Telegraph Company for misbilling customers)	Docket No. 900960-TL
In re: Petition on behalf of Citizens of the State of Florida to initiate investigation into integrity of Southern Bell Telephone and Telegraph Company's repair service activities and reports)	Docket No. 910163-TL
In re: Investigation into Southern Bell Telephone and Telegraph Company's compliance with Rule 25-4.110(2), F.A.C., Rebates)	Docket No. 910727-TL Filed: February 15, 1993

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
RESPONSE AND OBJECTIONS TO PUBLIC COUNSEL'S
TWENTY-SIXTH REQUEST 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 Rule 1.350 of the Florida Rules of Civil Procedure, its Responses and Objections to the Office of Public Counsel's ("Public Counsel"), Twenty-Sixth Request for Production of Documents dated January 15, 1993; and (2) pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, its Motion for Temporary Protective Order.

MOTIONS FOR TEMPORARY PROTECTIVE ORDER

Some of the documents that will be delivered to or made

available for review by Public Counsel contain proprietary, confidential business information that should not be publicly disclosed. Thus, pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, Southern Bell moves the Prehearing Officer to issue a Temporary Protective Order exempting these documents from § 119.07(1), Florida Statutes. These documents contain, among other things, internal audits, non-regulated competitive information, and other proprietary confidential business information. Such information is specifically included as proprietary confidential business information pursuant to § 364.183, Florida Statutes. If Public Counsel subsequently notifies Southern Bell that any of the proprietary documents are to be used in a proceeding before the Commission, Southern Bell will, in accordance with Rule 25-22.006, Florida Administrative Code, file a detailed motion for protective order specifically addressing each of the documents identified.

GENERAL RESPONSES AND OBJECTIONS

1. Southern Bell objects to Public Counsel's proposed "Instruction" relating to details of privileged documents. To the extent a document responsive to any of the requests is subject to an applicable privilege, some of the information requested by Public Counsel would be similarly privileged and therefore not subject to discovery.

2. Southern Bell objects to Public Counsel's definition of "document" or "documents." Public Counsel's definition of these terms is overly broad and is objectionable pursuant to standards

adopted in Caribbean Security Systems v. Security Control Systems, Inc., 486 So.2d 654 (Fla. App. 3rd District 1986).

3. Southern Bell does not believe it was Public Counsel'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.

4. Southern Bell objects to the specific time and place designated by Public Counsel for the production of documents for the reasons that the designation is not reasonable, but has no objection to producing the documents that are responsive and to which no other objection is made, at a mutually agreed upon time and place.

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

SPECIFIC RESPONSES

6. With respect to Request No. 328, as agreed to by Public Counsel and counsel for Southern Bell, Southern Bell is not required to respond to Request No. 328.

7. With respect to Request No. 329, Southern Bell has previously provided responsive documents in connection with Public Counsel's Twenty-Third Request for Production of Documents, Item No. 321.

8. With respect to Request No. 330, Southern Bell objects to this request on the basis that it calls for the production of

a voluminous and unduly burdensome amount of documents constituting almost 200 linear feet and located in Birmingham, AL, Atlanta, GA, and Columbia, SC.

9. With respect to Request No. 331, Southern Bell objects to this request to the extent it seeks a description of the substance of the report described therein, which report is subject to the attorney client and attorney work product privileges. To the extent the responsive documents did not disclose material subject to these privileges, Public Counsel reviewed same on February 9, 1993.

10. With respect to Request No. 332, Public Counsel reviewed all responsive documents on February 9, 1993.

11. With respect to Request No. 333, Southern Bell objects to providing this document on the basis that the document is subject to the statutory accountant-client privilege, Florida Statutes § 473.316.

12. With respect to Request No. 334, Southern Bell will produce responsive documents it has in its possession, custody, or control at a mutually convenient time and place.

13. With respect to Request No. 335, Southern Bell will produce responsive documents it has in its possession, custody, or control at a mutually convenient time and place.

14. With respect to Request No. 336, Southern Bell will produce responsive documents it has in its possession, custody, or control at a mutually convenient time and place.

15. With respect to Request No. 337, Southern Bell will

produce responsive documents it has in its possession, custody, or control at a mutually convenient time and place.

16. With respect to Request No. 338, Southern Bell will produce responsive documents it has in its possession, custody, or control at a mutually convenient time and place.

17. With respect to Request No. 339, Southern Bell has previously provided responsive documents in connection with Public Counsel's Twelfth Production of Documents, Item No. 157.

18. With respect to Request No. 340, Southern Bell will produce responsive documents it has in its possession, custody, or control at a mutually convenient time and place.

19. With respect to Request No. 341, Southern Bell will produce responsive documents it has in its possession, custody, or control at a mutually convenient time and place.

20. With respect to Request No. 342, Southern Bell will produce responsive documents it has in its possession, custody, or control at a mutually convenient time and place.

21. With respect to Request No. 343, Southern Bell objects to this request on the basis that it calls for the production of a voluminous and unduly burdensome amount of documents consisting of several thousand pages. Southern Bell will produce the results of the Telsam reports by district for the state of Florida for the periods for which Southern Bell has retained the data.

22. With respect to Request No. 344, Southern Bell will produce responsive documents it has in its possession, custody,

or control at a mutually convenient time and place.

23. With respect to Request No. 345, Southern Bell will produce responsive documents it has in its possession, custody, or control at a mutually convenient time and place.

24. With respect to Request No. 346, see response to Request No. 344.

25. With respect to Request No. 347, Southern Bell will produce responsive documents it has in its possession, custody, or control at a mutually convenient time and place.

26. With respect to Request No. 348, Southern Bell will produce responsive documents it has in its possession, custody, or control at a mutually convenient time and place.

27. With respect to Request No. 349, Southern Bell has no documents responsive to this request.

28. With respect to Request No. 350, Southern Bell will produce responsive documents it has in its possession, custody, or control at a mutually convenient time and place.

29. With respect to Request No. 351, Southern Bell will produce responsive documents it has in its possession, custody, or control at a mutually convenient time and place.

30. With respect to Request No. 352, Southern Bell will produce responsive documents it has in its possession, custody, or control at a mutually convenient time and place.

31. With respect to Request No. 353, Southern Bell has no documents responsive to this request.

32. With respect to Request No. 354, Southern Bell has no

documents responsive to this request.

33. With respect to Request No. 355, Southern Bell has no documents responsive to this request.

34. With respect to Request No. 356, as agreed to by Southern Bell and Public Counsel, Southern Bell will produce responsive documents from the files of Carlton Baker, Joseph Lacher, Anthony Lombardo, Ted Kennedy, Jerry Wilson, and Marshall Criser at a mutually convenient time and place.

Respectfully submitted this 15th day of February, 1993.

SOUTHERN BELL TELEPHONE
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