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ORIGINAL
FILE COPY

October 22, 1993

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 Objection to Staff's Twenty-Sixth Request for Production of Documents. Please file this document 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. 2 Copies have been served on the parties shown on the attached certificate of Service.

- ACK
- AFA 2
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG 1 W
- LIN 6
- GFC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

Sincerely,

Nancy B. White (BW)
Nancy B. White

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

RECEIVED & FILED
MA Smiley
EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
11455 OCT 22 83
FPSC-RECORDS/REPORTING

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
Filed: October 22, 1993

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
RESPONSE AND OBJECTIONS TO STAFF'S TWENTY-SIXTH
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, and Rule 25-22.006(3)(a), Florida Administrative Code, its Response and Objections to Staff's Twenty-Sixth Request for Production of Documents dated September 17, 1993.

GENERAL RESPONSE AND OBJECTIONS

1. Southern Bell objects to Staff's definition of "document" or "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

11455 OCT 22 83

FPSC-RECORDS/REPORTING

SPECIFIC RESPONSES

4. In response to Request No. 248, Southern Bell objects to this request on the basis that Southern Bell does not have possession, custody, or control of such information. Notwithstanding this objection, the entity in possession of such documents will make them available for review by Staff at the location where they are kept in the ordinary course of business (Atlanta, Georgia).

5. With respect to Request No. 249, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

6. With respect to Request No. 250, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place subject to the Request for Confidential Classification to be filed contemporaneously with the serving of Southern Bell's Request for Production of Documents responses.

7. With respect to Request No. 251, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

8. With respect to Request No. 252, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

9. With respect to Request No. 253, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

Respectfully submitted this 22nd day of October, 1993.

SOUTHERN BELL TELEPHONE
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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 22nd day of October, 1993 to:

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