LAW OFFICES

McWhirter, Reeves, McGlothlin, Davidson & Bakas

100 North Tampa Street, Suite 2900

TAMPA, FLORIDA 33602-5126

TALLAHASSEE OFFICE 315 South Calhoun Street SUITE 716

MAILING ADDRESS: TAMPA

P.O. Box 3350, Tampa, Florida 33601-3350 Tallahassee, Florida 32301

Telephone (904) 222-2525

TELEPHONE (813) 224-0866 Fax (813) 221-1854

Fax (904) 222-5606

CABLE GRANDLAW

PLEASE REPLY To:

TALLAHASSEE

December 10, 1993

Mr. Steve Tribble, Director Division of Records and Reporting 101 East Gaines Street Tallahassee, Florida 32399

> Docket No. 920266 TL, Comprehensive Review of the Revenue Re: Requirements and Rate Stabilization Plan of Southern Bell Telephone and Telegraph Company.

Dear Mr. Tribble:

JOHN W. BARAS, JR.

LEWIS J. CONWELL LINDA C. DARSEY

C. THOMAS DAVIDSON

ENRICO G. GONZALEZ

RICHARD W. REEVES FRANK J. RIEF, III MATTHEW D. SOYSTER

PAUL A. STRASKE

VICKI GORDON KAUFMAN

JOSEPH A. McGLOTHLIN RICHARD S. McIVER

JOHN W. McWHIRTER, JR.

LESLIE JOUGHIN, III

AILEEN S. DAVIS STEPHEN O. DECKER

> Enclosed for filing and distribution are the original and 15 copies of the Florida Interexchange Carriers Association's Objection to Discovery Request, in the above docket.

> Please acknowledge receipt of the above on the extra copy Thank you for your enclosed herein and return it to me.

| AFA 3 | Sincerely, |
|---------|---|
| APP | Dich: Hudas Hand |
| CAF | Ville Søden Kaufman Vicki Gordon Kaufman |
| CVV | |
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Enclosures 50 Commence of the second 000 1 WAS ____ 57H _____

DOCUMENT NUMBER - DATE

13251 DEC 10 8

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

DATED: December 10, 1993

THE FLORIDA INTEREXCHANGE CARRIERS ASSOCIATION'S OBJECTION TO DISCOVERY REQUEST

The Florida Interexchange Carriers Association (FIXCA), pursuant to Order Establishing Procedure, Order No. PSC-92-1195-PCO-TL, hereby gives notice of its intent to object to certain discovery propounded by Southern Bell Telephone and Telegraph Company (Southern Bell). FIXCA states:

- 1. Order No. PSC-92-1195-PCO-TL requires parties to give notice of their intent to object to a discovery request within 10 days of service.
- 2. On November 30, 1993, Southern Bell served its First Set of Interrogatories and Request for Production of Documents on FIXCA. FIXCA hereby gives notice that on the due date of its response, it intends to object to production request #2 on the basis that it is overly broad and irrelevant.

Joseph A. McGlothlan
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin
Davidson and Bakas
315 South Calhoun Street
Suite 716
Tallahassee, Florida 32301
904/222-2525

Attorneys for the Florida Interexchange Carriers Association DOCUMENT HUMBER-DATE

13251 DEC 10 #

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Florida Interexchange Carriers Association's Objection to Discovery Request has been furnished by U.S. Mail to the following parties of record, this 10th day of December, 1993:

Angela B. Green
Division of Legal Services
Florida Public Service
Commission
101 East Gaines Street
Tallahassee, FL 32399

Marshall M. Criser
Southern Bell Telephone and
Telegraph Company
150 South Monroe Street
Sun Bank Building, Suite 400
Tallahassee, FL 32301

Michael J. Henry MCI Telecommunications Corp. 780 Johnson Ferry Road Suite 700 Atlanta, GA 30342

Charles J. Beck
Deputy Public Counsel
Office of Public Counsel
Claude Pepper Bldg., Rm. 812
111 W. Madison Street
Tallahassee, FL 32301

Chanthina R. Bryant Tony Key 3065 Cumberland Circle Atlanta, GA 30339

Dan B. Hendrickson Post Office Box 1201 Tallahassee, FL 32302

Robin Norton
Division of Communications
Florida Public Service
Commission
101 East Gaines Street
Tallahassee, FL 32301

Lance C. Norris
Florida Pay Telephone
Association, Inc.
315 S. Calhoun Street
Suite 710
Tallahassee, FL 32301

Thomas F. Woods Gatlin, Woods, Carlson and Cowdery 1709-D Mahan Drive Tallahassee, FL 32308

Rick Melson Hopping, Boyd, Green and Sams 123 South Calhoun Post Office Box 6526 Tallahassee, FL 32301

Michael W. Tye AT&T Communications 106 East College Avenue Suite 1410 Tallahassee, FL 32301

Kenneth A. Hoffman Messer, Vickers, Caparello Madsen, Lewis, Goldman & Metz Post Office Box 1876 Tallahassee, FL 32302-1876

Laura L. Wilson
Florida Cable Television
Association
Post Office Box 10383
310 North Monroe Street
Tallahassee, FL 32302

Monte Belote Florida Consumer Action Network 4100 W. Kennedy Blvd. #128 Tampa, FL 33609 Michael A. Gross Assistant Attorney General Department of Legal Affairs PL-01, The Capitol Tallahassee, FL 32399-1050

Rick Wright
Auditing & Financial Analysis
Division
Fla. Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

Vicki Gordon Kaufman