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August 30, 1996

Mrs. Blanca S. Bayo  
Director, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399

RE: Docket No. 920260-TL

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Objections to Florida Cable Telecommunications Association, Inc.'s First Request for Production of Documents. Please file these documents in the 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.

Sincerely,

*Nancy B. White*  
(Signature)

Nancy B. White

- ACK 1
- AFA 1 Enclosures
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU Norton
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 1
- LIN 5
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

cc: All Parties of Record  
A. M. Lombardo  
R. G. Beatty  
W. J. Ellenberg

RECEIVED & FILED

EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE  
09239 AUG 30 96  
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: August 30, 1996  
Company )  
\_\_\_\_\_ )

BELLSOUTH TELECOMMUNICATIONS, INC.'S  
OBJECTIONS TO FCTA'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), hereby files, pursuant to Rule 25-22.034 and 25-22.035, Florida Administrative Code, and Rules 1.340 and 1.280(b), Florida rules of Civil Procedure, hereby submits the following Objections to Florida Cable Telecommunications Association, Inc.'s ("FCTA") First Request for Production of Documents to BellSouth.

The objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the ten-day requirement set forth in the procedural order issued by the Florida Public Service Commission ("Commission") in this docket. Should additional grounds for objection be discovered as BellSouth prepares its Answers to the above-referenced set of interrogatories, BellSouth reserves the right to supplement, revise, or modify its objections at the time that it serves its Answers on FCTA. Moreover, should BellSouth determine that a Protective Order is necessary with respect to any of the material requested by FCTA, BellSouth reserves the right to file a motion with the Commission seeking such an order at the time that it serves its Answers on FCTA.

DOCUMENT NUMBER-DATE

09239 AUG 30 96

FPSC-RECORDS/REPORTING

## GENERAL OBJECTIONS

BellSouth makes the following General Objections to FCTA's First Request for Production of Documents which will be incorporated by reference into BellSouth's specific responses when its Answers are served on FCTA.

1. BellSouth objects to the requests to the extent that such requests seek to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such requests are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. BellSouth has interpreted FCTA's requests to apply to BellSouth's regulated intrastate operations in Florida and will limit its Answers accordingly. To the extent that any request is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission, BellSouth objects to such request as irrelevant, overly broad, unduly burdensome, and oppressive.

3. BellSouth objects to each and every request and instruction to the extent that such request or instruction calls for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. BellSouth objects to each and every request insofar as the request is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained. Any Answers provided by

BellSouth in response to FCTA's requests will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth objects to each and every request insofar as the request is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. BellSouth will attempt to note each instance where this objection applies.

6. BellSouth objects to FCTA's discovery requests, instructions and definitions, insofar as they seek to impose obligations on BellSouth which exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

7. BellSouth objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

8. BellSouth objects to each and every request, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. BellSouth objects to each and every request to the extent that the information requested constitute "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that FCTA's interrogatories request proprietary confidential business information which is not subject to the "trade secrets" privilege, BellSouth will make such information available to counsel for FCTA pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

OBJECTIONS TO SPECIFIC REQUESTS

Subject to, and without waiver of, the foregoing general objections, BellSouth enters the following specific objections with respect to FCTA's requests:

10. BellSouth objects to Request No. 2 to the extent the request seeks portions of BellSouth's tariff, because applicable tariffs are on file with the Commission, are a matter of public record, and are equally available to FCTA. Moreover, BellSouth objects to Request No. 2 on the grounds that the request seeks information concerning states other than Florida and, therefore, does not seek information that is relevant nor is the request reasonably calculated to lead to the discovery of admissible evidence.

Respectfully submitted this 30th day of August, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.

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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 30th day of August, 1996 to:

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