

David M. Falgoust
General Attorney

Southern Bell Telephone
and Telegraph Company
Suite 4300 - Legal Department
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375
404 529-3865

BY HAND DELIVERY

November 30, 1990

ORIGINAL
FILE COPY

Mr. Steve Tribble
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

Re: ~~FPSC~~ Docket No. 891194-TL

Dear Mr. Tribble:

This letter is to notify you that today Southern Bell Telephone and Telegraph Company responded to Hearing Officer Basley's oral order of November 28, 1990 instructing Southern Bell to produce a list of all documents in the possession of BellSouth Corporation that are responsive to specified parts of Citizens' First and Second Requests for Production of Documents in the captioned matter.

I have enclosed for filing a copy of my letter of this date to Public Counsel describing the documents that have been made available by BellSouth Corporation and describing those documents with respect to which BellSouth Corporation has asserted attorney-client privilege.

ACK

AFA

APP

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OTH

A copy of this letter is also enclosed. Please indicate on the copy that the original was filed and return the copy to me. All parties of record have been served in accordance with the attached Certificate of Service.

Very truly yours,

David M. Falgoust

David M. Falgoust

Enclosures

cc: H. R. Anthony
A. H. Lombardo
R. D. Lackey

RECEIVED & FILED

A BELL SOUTH Company

FPSC BUREAU OF RECORDS

DOCUMENT NUMBER 10660

10660 NOV 30 1990

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 891194-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 30th day of November, 1990
to:

Walter D'Haeseleer
Division of Communications
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0866

Angela Greene
Division of Legal Services
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0863

Jack Shreve
Public Counsel
Office of the Public Counsel
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Richard E. Doran
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David M. Sulzger

David M. Feigouat
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Atlanta, Georgia 30375
404 529-2665

BY HAND DELIVERY

November 30, 1990

Mr. Charles J. Beck
Associate Public Counsel
c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, Florida 32399-1400

Re: FPSC Docket No. 891194-TL

Dear Charlie:

Pursuant to Commissioner Easley's oral order of November 28, 1990, Southern Bell has requested BellSouth Corporation to conduct a search for documents in its possession which would be responsive to those parts of Citizens' First Request for Production of Documents to which Commissioner Easley's order applied and to Citizens' Second Request for Production of Documents.

BellSouth Corporation has advised me that it has conducted such a search on a department-by-department basis. As a result of that search, BellSouth Corporation has this date delivered 180 documents, consisting of several hundred pages, to my office. The attached list describes each of the documents produced by BellSouth Corporation. Many of these documents appear to be duplicates of what has already been produced to you. They are all available, however, for your immediate review at my office. If you prefer, I will have them transported to Southern Bell's executive offices in Tallahassee for your inspection.

In addition, there are several documents which may be responsive to your requests with respect to which BellSouth Corporation has asserted attorney-client privilege. Those documents are identified and described in a memorandum dated November 30, 1990 from Bill Barfield to R. Douglas Lackey, a copy of which is also attached to this letter.

All of the documents referred to above are the result of a complete and thorough search as BellSouth Corporation has been able to conduct in a forty-eight hour period. Of course, if any additional responsive documents are discovered, you will be so notified.

Please advise me at your earliest convenience whether you wish me to deliver the BellSouth Corporation documents to Tallahassee for your review.

Very truly yours,

David M. Falgout

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Enclosures

cc: H. R. Anthony
A. H. Lombardo
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