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ORIGINAL  
FILE COPY

August 21, 1992

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:

On June 26, 1992, Southern Bell was served with a Request for Admissions which was labeled with a double caption, that of Docket No. 910163-TL and that of Docket No. 920260-TL. On July 24, 1992, Southern Bell filed its Responses and Objections to the Request for Admissions, but failed to put both captions on the pleading. Consequently, the responses which were intended to apply and be filed in both dockets were apparently only filed in Docket No. 910163. To correct the administrative record, I have an original and 15 copies of the response with the caption for Docket No. 920260-TL which should be filed in that proceeding.

An additional copy of this pleading for Docket No. 920260-TL 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 yours,

*Nancy B. White*  
Nancy B. White of

Enclosures

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

RECEIVED & FILED

*JJ*  
EPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

09524 AUG 21 1992

EPSC-RECORDS/REPORT...

**CERTIFICATE OF SERVICE**  
**Docket No. 920260-TL**

I HEREBY CERTIFY that a copy of the foregoing has been furnished  
by United States Mail this 21st day of August, 1992 to:

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Tallahassee, FL 32303

Nancy B. White  
of

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 (Formerly FPSC Docket )  
Number 880069-TL) )  
\_\_\_\_\_ )

Docket No. 920260-TL  
Filed: July 24, 1992

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SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S OBJECTIONS  
TO PUBLIC COUNSEL'S FIRST SET OF REQUESTS FOR ADMISSION

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 1.370 of the Florida Rules of Civil Procedure, its Responses and Objections to the Office of Public Counsel's ("Public Counsel") First Set of Requests for Admission dated June 26, 1992.

1. Southern Bell admits Request for Admission No. 1.
2. Southern Bell denies Request for Admission No. 2.
3. Southern Bell admits Request for Admission No. 3.
4. Southern Bell admits Request for Admission No. 4.
5. Southern Bell denies Request for Admission No. 5.
6. Southern Bell denies Request for Admission No. 6.
7. Southern Bell admits Request for Admission No. 7.
8. Southern Bell denies Request for Admission No. 8.
9. Southern Bell does not understand Request for Admission No. 9. and cannot frame a responsive answer. Southern Bell therefore, denies Request for Admission No. 9.
10. Southern Bell admits Request for Admission No. 10.
11. Southern Bell denies Request for Admission No. 11.

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12. Southern Bell denies Request for Admission No. 12.

13. Southern Bell denies Request for Admission No. 13.

14. Southern Bell admits Request for Admission No. 14.

15. Southern Bell admits Request for Admission No. 15.

16. Request for Admission No. 16 seeks information upon which the privileges of attorney client communication or attorney work product or both have been asserted and therefore, Southern Bell will not respond to this request.

17. Request for Admission No. 17 seeks information upon which the privileges of attorney client communication or attorney work product or both have been asserted and therefore, Southern Bell will not respond to this request.

18. Request for Admission No. 18 seeks information upon which the privileges of attorney client communication or attorney work product or both have been asserted and therefore, Southern Bell will not respond to this request.

19. To the extent that Request for Admission No. 19 assumes that all falsification of customer repair records resulted in customers being denied rebates to which they were otherwise due, Southern Bell denies Request for Admission No. 19.

20. Request for Admission No. 20 seeks information upon which the privileges of attorney client communication or attorney work product or both have been asserted and therefore, Southern Bell will not respond to this request.

21. Request for Admission No. 21 seeks information upon which the privileges of attorney client communication or attorney

work product or both have been asserted and therefore, Southern Bell will not respond to this request.

22. Request for Admission No. 22 seeks information upon which the privileges of attorney client communication or attorney work product or both have been asserted and therefore, Southern Bell will not respond to this request.

23. Request for Admission No. 23 seeks information upon which the privileges of attorney client communication or attorney work product or both have been asserted and therefore, Southern Bell will not respond to this request.

24. Request for Admission No. 24 seeks information upon which the privileges of attorney client communication or attorney work product or both have been asserted and therefore, Southern Bell will not respond to this request.

25. Request for Admission No. 25 seeks information upon which the privileges of attorney client communication or attorney work product or both have been asserted and therefore, Southern Bell will not respond to this request.

26. Request for Admission No. 26 seeks information upon which the privileges of attorney client communication or attorney work product or both have been asserted and therefore, Southern Bell will not respond to this request.

27. Request for Admission No. 27 seeks information upon which the privileges of attorney client communication or attorney work product or both have been asserted and therefore, Southern Bell will not respond to this request.

28. Request for Admission No. 28 seeks information upon which the privileges of attorney client communication or attorney work product or both have been asserted and therefore, Southern Bell will not respond to this request.

29. Request for Admission No. 29 seeks information upon which the privileges of attorney client communication or attorney work product or both have been asserted and therefore, Southern Bell will not respond to this request.

Respectfully submitted this 24th day of July, 1992.

ATTORNEYS FOR SOUTHERN BELL  
TELEPHONE AND TELEGRAPH COMPANY

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