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SIDNEY J. WHITE, JR.
General Attorney

Southern Bell Telephone
and Telegraph Company
Suite 400
150 South Monroe Street
Tallahassee, Florida 32301
(404) 529-5094

ORIGINAL
FILE COPY

August 24, 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:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Response and Objections to Public Counsel's Fourteenth Request for Production of Documents and Motion for a Temporary Protective Order. 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,

Sidney J. White, Jr.
Sidney J. White, Jr. (2)

ACK 1
AFA 3
APP _____
CAF _____
CMLI _____

Enclosures

CTH cc: All Parties of Record
A. M. Lombardo
EAG _____ H. R. Anthony
LEG 1 w/ MR. D. Lackey
LBN 6

CFB _____

RCR _____ RECEIVED & FILED

SEP 1

WAD _____ FPSC BUREAU OF RECORDS

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CERTIFICATE OF SERVICE
Docket No. 920260-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished
by United States Mail this 24th day of August, 1992 to:

Robin Norton
Division of Communications
Florida Public Svc Commission
101 East Gaines Street
Tallahassee, FL 32399-0866

Michael J. Henry
MCI Telecommunications Corp.
MCI Center
Three Ravinia Drive
Atlanta, Georgia 30346-2102

Angela Green
Division of Legal Services
Florida Public Svc Commission
101 East Gaines Street
Tallahassee, FL 32399-0863

Richard D. Melson
Hopping Boyd Green & Sams
Post Office Box 6526
Tallahassee, Florida 32314
atty for MCI

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Grandoff & Reeves
Suite 200, 522 East Park Avenue
Tallahassee, Florida 32301
atty for FIXCA

Rick Wright
Regulatory Analyst
Division of Audit and Finance
Florida Public Svc Commission
101 East Gaines Street
Tallahassee, FL 32399-0865

Joseph Gillan
J. P. Gillan and Associates
Post Office Box 541038
Orlando, Florida 32854-1038

Peter M. Dunbar
Haben, Culpepper, Dunbar
& French, P.A.
Post Office Box 10095
Tallahassee, FL 32301
atty for FCTA

Patrick K. Wiggins
Wiggins & Villacorta, P.A.
Post Office Drawer 1657
Tallahassee, Florida 32302
atty for Intermedia

Chanthina R. Bryant
Sprint
3065 Cumberland Circle
Atlanta, GA 30339

Floyd R. Self, Esq.
Messer, Vickers, Caparello,
Madsen, Lewis & Metz, PA
Post Office Box 1876
Tallahassee, FL 32302
atty for US Sprint

Michael W. Tye
AT&T Communications of the
Southern States, Inc.
Suite 1410
106 East College Avenue
Tallahassee, Florida 32301

Charles J. Beck
Deputy Public Counsel
Office of the Public Counsel
Room 812, 111 W. Madison Street
Tallahassee, FL 32399-1400

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

Monte Belote
Florida Consumer Action Network
4100 W. Kennedy Blvd. #128
Tampa, FL 33609

The American Association of
Retired Persons
c/o Charlotte Brayer, Esquire
275 John Knox Road, EE 102
Tallahassee, FL 32303

Sidney J. White, Jr.
(02)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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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: August 24, 1992

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
RESPONSE AND OBJECTIONS TO PUBLIC COUNSEL'S
FOURTEENTH REQUEST FOR PRODUCTION OF DOCUMENTS
AND MOTION FOR A TEMPORARY PROTECTIVE ORDER

COMES NOW BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), and files, (1) pursuant to Rule 25-22.034, Florida Administrative Code, and Rules 1.280(c) and 1.350 of the Florida Rules of Civil Procedure, its Responses and Objections to the Office of Public Counsel's ("Public Counsel") Fourteenth Request for Production of Documents dated July 24, 1992, and (2) pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, its Motion for Temporary Protective Order.

GENERAL RESPONSE AND OBJECTIONS

1. Southern Bell objects to Public Counsel's definition of "document" or "documents". Public Counsel's definition of these terms is overly broad and is objectionable pursuant to standards adopted in Caribbean Security Systems v. Security Control Systems, Inc., 486 So.2d 654 (Fla. App. 3rd District 1986).

2. Southern Bell objects to Public Counsel's definition of "you" and "your" as well as the definition of "Southern Bell". It appears that Public Counsel, through its definition of these words, is attempting to obtain discovery of information in the

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possession, custody, or control of entities that are not parties to this docket. Requests for Production may only be directed to parties, and any attempt by Public Counsel to obtain discovery from non-parties should be prohibited. See Rule 1.340, Florida Rules of Civil Procedure; Broward v. Kerr, 454 So.2d 1068 (4th D.C.A. 1984).

3. Southern Bell does not believe it was Public Counsel'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.

4. Southern Bell objects to the specific time and place designated by Public Counsel for the production of documents for the reasons that the designation is not reasonable, but has no objection to producing the documents that are responsive and to which no other objection is made, at a mutually agreed upon time and place.

5. Some of the documents that will be delivered to and reviewed by Public Counsel contain proprietary, confidential business information that should not be publicly disclosed. Thus, pursuant to the Commission's Rule on confidentiality, Rule 25-22.006(5)(c), Florida Administrative Code, Southern Bell moves the Prehearing Officer to issue a Temporary Protective Order exempting these documents from § 119.07(1), Florida Statutes. If Public Counsel subsequently notifies Southern Bell that any of

the proprietary documents are to be used in a proceeding before the Commission, Southern Bell will, in accordance with Rule 25-22.006, Florida Administrative Code, file a detailed motion for protective order specifically addressing each of the documents identified.

SPECIFIC RESPONSES

6. In response to Request No. 190, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

7. In response to Request No. 191, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

8. In response to Request No. 191, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place, subject to the Motion for Temporary Protective Order set forth above. These documents contain, among other things, competitive information and marketing information related to the referenced plans. Also, See: Southern Bell's response to Public Counsel's First Request for Production of Documents, Request No. 16, also provided subject to a Motion for Temporary Protective Order.

9. In response to Request No. 192, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place, subject to the Motion for Temporary Protective Order set forth above. These

documents contain, among other things, marketing and service deployment plans and competitive analyses.

10. In response to Request No. 193, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

11. In response to Request No. 194, Southern Bell is attempting to locate a complete copy of the responsive document, and will produce the document as soon as it is available.

12. In response to Request No. 195, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

13. In response to Request No. 196, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

14. In response to Request No. 197, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place, subject to the Motion for Temporary Protective Order set forth above. These documents contain, among other things, forecasts of revenues for both regulated and non-regulated competitive services provided by Southern Bell.

15. In response to Request No. 198, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

16. In response to Request No. 199, Southern Bell will produce responsive documents that are in its possession, custody,

or control at a mutually convenient time and place, subject to the Motion for Temporary Protective Order set forth above. These documents contain, among other things, competitively sensitive market analyses conducted by Southern Bell.

17. In response to Request No. 200, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

18. In response to Request No. 201, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

19. In response to Request No. 202, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

20. In response to Request No. 203, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

21. In response to Request No. 204, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

22. In response to Request No. 205, Southern Bell has no documents responsive to this request.

23. In response to Request No. 206, Southern Bell has no documents responsive to this request.

24. In response to Request No. 207, Southern Bell has no documents responsive to this request.

25. In response to Request No. 208, Southern Bell has no documents responsive to this request.

26. In response to Request No. 209, Southern Bell has no documents responsive to this request.

27. In response to Request No. 210, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

28. In response to Request No. 211, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

29. In response to Request No. 212, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

30. In response to Request No. 213, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

31. In response to Request No. 214, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place subject to the Motion for Temporary Protective Order set forth above. These documents contain, among other things, confidential corporate tax return information.

Respectfully submitted this 24th day of August, 1992.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY

Harris R. Anthony
HARRIS R. ANTHONY
PHILLIP J. CARVER
c/o Marshall M. Criser
Suite 400
150 South Monroe Street
Tallahassee, Florida 32301
(305) 530-5555

R. Douglas Lackey
R. DOUGLAS LACKEY
SIDNEY J. WHITE, JR.
4300 Southern Bell Center
675 West Peachtree St., N.E.
Atlanta, Georgia 30375
(404) 529-3862
(404) 529-5094