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September 28, 1992

Mr. Steve C. Tribble
Director, Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

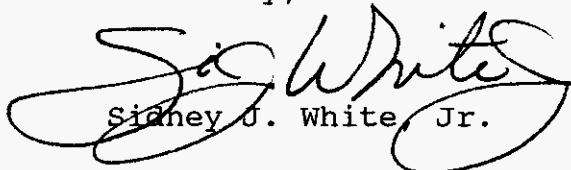
RE: Docket No. 920260-TL

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Response and Objections to MCI Telecommunications Corporation's First Request for Production of Documents and Motion for a 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.

ACK ✓
AFM 3
APP _____
CAF _____
Enclosures
CMU 2

CTP cc: All Parties of Record
A. M. Lombardo
EAG H. R. Anthony
LEG 1 w/R!! D. Lackey

LIN k
GFC _____
ROM _____
SEL 1
WFS _____
C... _____

DOCUMENT NUMBER-DATE

11303 SEP 28 1992

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 920260-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this 28th day of September, 1992 to:

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Motel Association

A handwritten signature in black ink, appearing to read "J. J. White". The signature is written in a cursive style with a horizontal line through the middle of the letters.

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 September 28, 1992
Company (Formerly FPSC Docket)
Number 880069-TL))
_____)

SOUTHERN BELL'S RESPONSE AND OBJECTIONS TO
MCI TELECOMMUNICATIONS CORPORATION'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND
MOTION FOR 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 MCI Telecommunications Corporation's ("MCI") First Request for Production of Documents dated August 27, 1992, and (2) Motion for Protective Order.

MOTION FOR PROTECTIVE ORDER

1. Southern Bell objects to producing some of the documents requested by MCI on the basis that the documents sought contain proprietary and confidential business information regarding, among other things, Southern Bell's market and competitive analyses, other competitively sensitive information, and information regarding competitive services provided by Southern Bell. Consequently, Southern Bell moves the Prehearing Officer to issue a Protective Order directing that discovery not be had with respect to the proprietary and confidential business documents referenced more specifically herein, or that discovery only be had under certain conditions. Southern Bell would be

willing to entertain negotiations regarding producing certain of these documents to the attorneys representing MCI upon the execution of an appropriate protective agreement.

GENERAL RESPONSE AND OBJECTIONS

2. Southern Bell objects to MCI's definition of "document" or "documents". MCI'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).

3. Southern Bell objects to MCI's instruction relating to the details of privileged documents. To the extent production is objected to due to the privileged nature of documents, the information suggested by MCI would similarly be privileged and is therefore prohibited.

4. Southern Bell objects to the instruction as to information that is to be provided for any document not in the possession of Southern Bell. This request for an extensive narrative as to the "disposition" of these documents is not properly encompassed with a Request for Production, and is, further, unreasonable and burdensome.

5. Southern Bell objects to MCI's Request for Production of Documents to the extent that it seeks documents which are not relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence relevant to the subject matter of this proceeding. This objection relates, among other things, to documents which contain other states' information and information on unregulated

services. Consistent with prior decisions of the Commission and in order to facilitate discovery in this proceeding, Southern Bell will produce, subject to the other objections contained herein, those documents which are responsive and which contain both relevant and irrelevant information, with the irrelevant information removed.

SPECIFIC RESPONSES

6. In response to Request No. 1, Southern Bell has no documents responsive to this request.

7. In response to Request No. 2, Southern Bell has no documents responsive to this request.

8. In response to Request No. 3, Southern Bell has no documents responsive to this request.

9. In response to Request No. 4, Southern Bell will produce responsive documents in its possession, custody, or control at a mutually convenient time and place.

10. In response to Request No. 5, Southern Bell has no documents responsive to this request.

11. In response to Request No. 6, Southern Bell has no documents responsive to this request.

12. In response to Request No. 7, Southern Bell objects to the request on the basis that the responsive documents contain proprietary confidential competitive market information and analyses. Consequently, Southern Bell moves for a Protective Order as set forth herein directing that discovery not be had as to the documents requested in this Item, or that any production

of such documents occur only after the execution of an acceptable protective agreement.

13. In response to Request No. 8, Southern Bell will produce responsive documents in its possession, custody, or control at a mutually convenient time and place.

14. In response to Request No. 9, Southern Bell will produce responsive documents in its possession, custody, or control at a mutually convenient time and place.

15. In response to Request No. 10, Southern Bell has no documents responsive to this request.

16. In response to Request No. 11, Southern Bell has no documents responsive to this request.

17. In response to Request No. 12, Southern Bell has no documents responsive to this request.

Respectfully submitted this 28th day of September, 1992.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY



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