

SIDNEY J. WHITE, JR.
General Attorney

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

November 19, 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 Staff's Seventh Request for Production of Documents and Notice of Intent to Request Confidential Classification. Please file these documents in the above-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. *of*

Enclosures

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

Note: Confidential Documents 13652-92 and 13653-92 are in Confidential file.

RECORDED

16F
FPC-RECORDS/REPORTING

DOCUMENT NUMBER-DATE

13651 NOV 19 1992

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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 19th day of November, 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
716 - 315 S. Calhoun Street
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

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

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

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

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

Floyd 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

Benjamin H. Dickens, Jr.
Blooston, Mordkofsky, Jackson,
& Dickens
2120 L Street, N.W.
Washington, DC 20037

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

Mr. Cecil O. Simpson
General Attorney
Mr. Peter Q. Nyce, Jr.
General Attorney
Regulatory Law Office
Advocate General
Department of the Army
901 North Stuart Street
Arlington VA 22203-1837

Michael B. Twomey
Assistant Attorney General
Department of Legal Affairs
Room 1603, The Capitol
Tallahassee, FL 32399-1050

Florida Pay Telephone
Association, Inc.
c/o Mr. Lance C. Norris
President
202 - 8130 Baymeadows Cir. West
Jacksonville, FL 32256

Bill L. Bryant, Jr., Esq.
Foley & Lardner
Suite 450
215 South Monroe Street
Tallahassee, FL 32302-0508

Douglas S. Metcalf (Ad Hoc)
Communications Consultants, Inc.
1600 E. Amelia Street
Orlando, FL 32803

Thomas F. Woods, Esq.
Gatlin, Woods, Carlson, and
Cowdery
1709-D Mahan Drive
Tallahassee, FL 32308
atty for the Florida Hotel and
Motel Association

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs, Odom &
Ervin
305 South Gadsen Street
Tallahassee, FL 32302

Laura L. Wilson, Esq.
Messer, Vickers, Caparello,
Madsen, Lewis & Metz, PA
Post Office Box 1876
Tallahassee, FL 32302
atty for FPTA

Sidney J. White, Jr.
PJ

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: November 19, 1992
Company (Formerly FPSC Docket)
Number 880069-TL))
_____)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S RESPONSE AND
OBJECTIONS TO STAFF'S SEVENTH REQUEST FOR PRODUCTION OF DOCUMENTS
AND NOTICE OF INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION

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 25-22.006(3)(a), Florida
Administrative Code, (1) its Response and Objections to Staff's
Seventh Request for Production of Documents and (2) its Notice of
Intent to Request Confidential Classification.

NOTICE OF INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION

Some of the documents that will be produced for the Staff in
response to its Seventh Request for Production of Documents
contain information which is exempted from public disclosure
pursuant to §§ 119.07 and 364.183, Florida Statutes.
Specifically, some of the documents contain, among other things,
demand information relating to intraLATA services which are or
could be subject to competition, and other Company proprietary
confidential business information. This information is included
as proprietary confidential business information under § 364.183,
Florida Statutes and Rule 25-22.006, Florida Administrative Code.
Because these documents contain exempt information, Southern Bell
is filing this Notice of Intent to Request Confidential

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Classification, pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, in order to allow the Staff access to these documents without delay. The original of this Notice has been filed with the Division of Records and Reporting, and a copy has been served on the division requesting this information.

GENERAL RESPONSE AND OBJECTIONS

1. Southern Bell objects to Staff's definition of "documents". Staff's definition of these terms is overly broad and is objectionable pursuant to standards adopted in *Caribbean Security Systems v. Security Control Systems, Inc.*, 46 So. 2d 654 (Fla. App. 3rd Dist. 1986).

2. Southern Bell does not believe it was Staff'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.

3. Staff inadvertently included several requests for production of documents in its Ninth Set of Interrogatories dated October 15, 1992. Specifically, Item Nos. 307, 309, 310, 311, 312, and 315 also requested that certain documents be produced. Pursuant to subsequent discussions between counsel for Staff and Southern Bell, it was agreed that the portions of the above-referenced Interrogatories seeking documents would be considered to be additional requests for production of documents to be added to Staff's Seventh Request for Production of

Documents dated October 15, 1992. It was further agreed that such requests should be numbered as follows:

<u>Interrogatory Number</u>	<u>Document Request Number</u>
307	108(a)
309	108(b)
310	108(c)
311	108(d)
312	108(e)
315	108(f)

Accordingly, Southern Bell will respond to each of these individual items as if they were originally posed as requests for production of documents.

4. The following Specific Responses are given subject to the above-stated General Response and Objections.

SPECIFIC RESPONSES

5. In response to Request No. 108, Southern Bell will produce responsive documents in its possession, custody, or control at a mutually convenient time and place.

6. In response to Request No. 108(a) (which relates to Staff's Ninth Set of Interrogatories, Item No. 307), Southern Bell will produce responsive documents in its possession, custody, or control at a mutually convenient time and place.

7. In response to Request No. 108(b) (which relates to Staff's Ninth Set of Interrogatories, Item No. 309), Southern Bell will produce responsive documents in its possession, custody, or control at a mutually convenient time and place.

8. In response to Request No. 108(c) (which relates to Staff's Ninth Set of Interrogatories, Item No. 310), Southern

Bell will produce responsive documents in its possession, custody, or control at a mutually convenient time and place.

9. In response to Request No. 108(d) (which relates to Staff's Ninth Set of Interrogatories, Item No. 311), 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. 108(e) (which relates to Staff's Ninth Set of Interrogatories, Item No. 312), Southern Bell objects to this request on the basis that it calls for the production of proprietary confidential business information in the form of demand analyses and other proprietary confidential business information relating to intraLATA services which are or could be subject to competition. Notwithstanding this objection, Southern Bell will produce responsive documents in its possession, custody, or control at a mutually convenient time and place subject to the Company's Notice of Intent to Request Confidential Classification set forth above.

11. In response to Request No. 108(f) (which relates to Staff's Ninth Set of Interrogatories, Item No. 315), Southern Bell objects to this request on the basis that it calls for the production of documents prepared by or for attorneys for Southern Bell in anticipation of litigation. As such, these documents are not being provided, inasmuch as they are protected from discovery under either the work product doctrine or the attorney-client privilege, or both. Notwithstanding this objection, Southern Bell will produce all other responsive documents in its

possession, custody, or control at a mutually convenient time and place.

Respectfully submitted this 19th day of November, 1992.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY

Harris R. Anthony *rg*
HARRIS R. ANTHONY
c/o Marshall M. Criser, III
400 - 150 South Monroe Street
Tallahassee, Florida 32301
(305) 530-5555

R. Douglas Lackey *rs*
R. DOUGLAS LACKEY
SIDNEY J. WHITE, JR.
4300 - 675 West Peachtree Street
Atlanta, Georgia 30375
(404) 529-5094