



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

I HEREBY CERTIFY that a copy of the foregoing has been furnished  
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A handwritten signature in black ink, appearing to read "J. J. White". The signature is written in a cursive style with a horizontal line underneath the name.

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: December 4, 1992  
Company (Formerly FPSC Docket )  
Number 880069-TL) )  
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SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S RESPONSE AND  
OBJECTIONS TO STAFF'S NINTH REQUEST FOR PRODUCTION OF DOCUMENTS

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, its Response and Objections to Staff's Ninth Request for Production of Documents dated October 30, 1992.

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

DOCUMENT NUMBER-DATE  
14182 DEC -4 1992  
FPSC-RECORDS/REPORTING

SPECIFIC RESPONSES

4. In response to Request No. 110, Southern Bell has already produced the document responsive to this request in response to Staff's Second Request for Production of Documents, Request No. 17.

5. In response to Request No. 111, Southern Bell will produce responsive documents in its possession, custody, or control at a mutually convenient time and place.

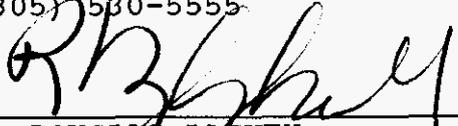
6. In response to Request No. 112, Southern Bell will produce a responsive document which represents a preliminary version of the 1993 budget view.

7. In response to Request No. 113, Southern Bell will produce responsive documents in its possession, custody, or control at a mutually convenient time and place.

Respectfully submitted this 4th day of December, 1992.

SOUTHERN BELL TELEPHONE  
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