



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

I HEREBY CERTIFY that a copy of the foregoing has been furnished  
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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 10, 1992  
Company (Formerly FPSC Docket )  
Number 880069-TL) )  
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SOUTHERN BELL'S RESPONSE AND OBJECTIONS TO  
FLORIDA INTEREXCHANGE CARRIER ASSOCIATION'S  
SECOND 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 Responses and Objections to the Florida Interexchange Carrier Association's ("FIXCA") Second Request for Production of Documents dated November 10, 1992.

GENERAL RESPONSE AND OBJECTIONS

1. Southern Bell objects to FIXCA's definition of "document" or "documentation." FIXCA'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 FIXCA'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 FIXCA would similarly be privileged and is therefore prohibited.

3. 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

DOCUMENT NUMBER-DATE

14355 DEC 10 1992

FPSC-RECORDS/REPORTING

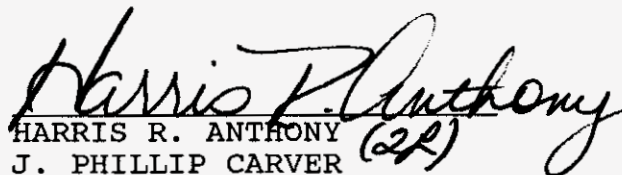
narrative as to the "disposition" of these documents is not properly encompassed with a Request for Production, and is, further, unreasonable and burdensome.

SPECIFIC RESPONSES

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

Respectfully submitted this 10th day of December, 1992.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY



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