

SIDNEY J. WHITE, JR.  
General Attorney

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

December 23, 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 Twelfth Request for Production of Documents. Please file this document 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. (eg)

ASA  
APP

Enclosures

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

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SEC  
*[Handwritten signature]*

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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 23rd day of December, 1992 to:

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

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

Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter, Grandoff & Reeves  
716 - 315 S. Calhoun Street  
Tallahassee, Florida 32301  
atty for FIXCA

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

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

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

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

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

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

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

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

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

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

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.*  
(2)

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 23, 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 TWELFTH 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 Twelfth Request for Production of Documents dated November 18, 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. Staff inadvertently included a request for production of documents in its Fourteenth Set of Interrogatories dated November 18, 1992. Specifically, Item No. 375 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 Interrogatory seeking documents would be considered to be an additional request for production of documents to be added to Staff's Twelfth Request for Production of Documents dated November 18, 1992. It was further agreed that Interrogatory No. 375 should be numbered as Document Request No. 125(a). Accordingly, Southern Bell will respond to this individual item as if it were originally posed as a request 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. 125, 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. 125(a), Southern Bell will produce responsive documents in its possession, custody, or control at a mutually convenient time and place.

Respectfully submitted this 23rd day of December, 1992.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY

Harris R. Anthony (02)  
HARRIS R. ANTHONY  
c/o Marshall M. Criser, III  
400 - 150 South Monroe Street  
Tallahassee, Florida 32301  
(305) 530-5555

R. Douglas Lackey (02)  
R. DOUGLAS LACKEY  
SIDNEY J. WHITE, JR.  
4300 - 675 West Peachtree Street  
Atlanta, Georgia 30375  
(404) 529-50941