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January 8, 1993

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 Public Counsel's Twenty-Fourth 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.

- ACK
- AFA 3
- APP _____
- CAF _____
- CMU 1
- CTR _____
- EAG cc: All Parties of Record
- LEG 1 w/m A. M. Lombardo
- LIN 6 H. R. Anthony
- OPC _____ R. D. Lackey
- RCH _____
- SEC 1
- WAS _____
- OTH _____

Enclosures

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

00327 JAN-83

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 8th day of January, 1993 to:

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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: January 8, 1993
Company)
_____)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
RESPONSE AND OBJECTIONS TO PUBLIC COUNSEL'S
TWENTY-FOURTH 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, and Rule 1.350, Florida Rules of Civil Procedure, its Responses and Objections to the Office of Public Counsel's ("Public Counsel") Twenty-Fourth Request for Production of Documents dated December 23, 1992.

GENERAL RESPONSE AND OBJECTIONS

1. Southern Bell objects to Public Counsel's definition of "document" or "documents". Public Counsel'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 Public Counsel's definition of "you" and "your" as well as the definition of "Southern Bell". It appears that Public Counsel, through its definition of these words, is attempting to obtain discovery of information in the possession, custody, or control of entities that are not parties to this docket. Requests for Production may only be directed to parties, and any attempt by Public Counsel to obtain discovery

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from non-parties should be prohibited. See Rule 1.340, Florida Rules of Civil Procedure; Broward v. Kerr, 454 So.2d 1068 (4th D.C.A. 1984).

3. Public Counsel filed a Motion to Require Production of Documents By January 8, 1993 contemporaneously with service of its Twenty-Fourth Request for Production of Documents on Southern Bell on December 23, 1992. Notwithstanding the fact that considering the permissible discovery response intervals under the Florida Rules of Civil Procedure, this discovery has been served on Southern Bell after the anticipated deadline for such discovery requests of this type (See Order No. PSC-92-1195-PCO-TL, issued October 21, 1992) Southern Bell will nevertheless voluntarily accede to Public Counsel's request that the Company respond to this discovery by January 8, 1993. Inasmuch as Southern Bell is agreeing to respond as indicated, no other formal response to Public Counsel's December 23, 1992 motion is necessary.

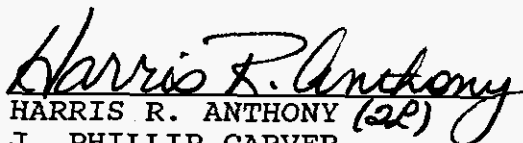
SPECIFIC RESPONSES

4. With respect to Request No. 322, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

5. With respect to Request No. 191, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

Respectfully submitted this 8th day of January, 1993.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY



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