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January 13, 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 Florida Cable Television Association's First Request for Production of Documents and Motion for Protective Order. 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,

*Nancy B. White*  
Nancy B. White  
(22)

- ACK
- AFA
- ADD \_\_\_\_\_
- CC \_\_\_\_\_
- CC
- Enclosures

- cc: All Parties of Record
- 1 cc  M. Lombardo
- 1 cc  R. Anthony
- 1 cc  R. D. Lackey

RECEIVED & FILED

*JTB*  
FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

00452 JAN 13 88

FPSC-RECORDS/REPORTING

*Chick*

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

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this 13th day of January, 1993 to:

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*Nancy B. White*  
(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: January 13, 1993  
Company (Formerly FPSC Docket )  
Number 880069-TL) )  
\_\_\_\_\_ )

SOUTHERN BELL'S RESPONSE AND OBJECTIONS TO  
FLORIDA CABLE TELEVISION ASSOCIATION'S  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND  
MOTION FOR PROTECTIVE ORDER

COMES NOW BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), and files, (1) pursuant to Rule 25-22.034, Florida Administrative Code, and Rules 1.280(c) and 1.350 of the Florida Rules of Civil Procedure, its Responses and Objections to the Florida Cable Television Association's ("FCTA") First Request for Production of Documents dated December 14, 1992, and (2) Motion for Protective Order.

GENERAL RESPONSE AND OBJECTIONS

1. Southern Bell objects to FCTA's definition of "document" or "documents". FCTA'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 FCTA's Request for Production of Documents to the extent that it seeks documents which are not relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence relevant to the subject matter of this proceeding. This

objection relates, among other things, to documents which contain other states' information. Consistent with prior decisions of the Commission and in order to facilitate discovery in this proceeding, Southern Bell will produce, subject to the other objections contained herein, those documents which are responsive and which contain both relevant and irrelevant information, with the irrelevant information removed.

3. Southern Bell objects to producing some of the documents requested by FCTA on the basis that the documents sought contain proprietary and confidential business information regarding, among other things, Southern Bell's relationship with its vendors, market and competitive analyses, other competitively sensitive information, and information regarding competitive services provided by Southern Bell. Consequently, Southern Bell moves the Prehearing Officer to issue a Protective Order directing that discovery not be had with respect to the proprietary and confidential business documents referenced more specifically herein, or that discovery only be had under certain conditions. Southern Bell would be willing to entertain negotiations regarding producing certain of these documents to the attorneys representing FCTA upon the execution of an appropriate protective agreement.

#### SPECIFIC RESPONSES

4. In response to Request No. 1, Southern Bell has no responsive documents in its possession, custody, or control

inasmuch as Southern Bell does not provide intrastate video transport service in Florida.

5. In response to Request No. 2, Southern Bell has no responsive documents in its possession, custody, or control inasmuch as Southern Bell does not provide intrastate video transport service in Florida.

6. In response to Request No. 3, Southern Bell has no responsive documents in its possession, custody, or control inasmuch as Southern Bell does not provide intrastate video transport service in Florida.


7. In response to Request No. 4, Southern Bell has no responsive documents in its possession, custody, or control inasmuch as Southern Bell does not provide intrastate video transport service in Florida.

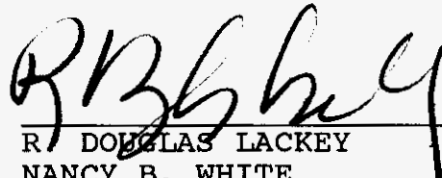
8. In response to Request No. 5, Southern Bell objects to this request as being overbroad and unduly burdensome. Most of the information consists of almost 13,000 pages of printouts, plats, and drawings located in twelve district engineering offices in Florida. Further, many of these documents contain proprietary and confidential business information relating to, among other things, specific prices, costs and delivery schedules as well as the details of customer/vendor relationships between Southern Bell and its suppliers. Consequently, Southern Bell moves for a Protective Order as set forth herein directing that discovery not be had as to the proprietary and confidential business documents requested in this Item, or that any production

of such documents occur only after the execution of an acceptable protective agreement. Southern Bell will produce certain documents responsive to Interrogatory No. 9 that are in its possession, custody, or control at a mutually convenient time and place.

Respectfully submitted this 13th day of January, 1993.

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AND TELEGRAPH COMPANY

  
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