

NANCY B. WHITE
General Attorney

Southern Bell Telephone
and Telegraph Company
Suite 400
150 South Monroe Street
Tallahassee, Florida 32301
(404) 529-5387

January 14, 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 Staff's Eighteenth Request for Production of Documents and Notice to Intent to Request Confidential Classification. 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. ACK copies have been served on the parties shown on the attached Certificate of Service.

- APP _____
- CAF _____
- CMR _____
- CTD _____

Sincerely,

Nancy B. White
Nancy B. White
(22)

ENC - Enclosures

- LEG 1
- LI 6 cc: All Parties of Record
- A. M. Lombardo
- H. R. Anthony
- R. D. Lackey

- REC _____
- SEC 1
- WAS _____
- OTH Kay

[Signature]
FPSC-DIVISION OF RECORDS

DOCUMENT NUMBER-DATE

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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 14th day of January, 1993 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

Everett Boyd
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.
P.O. Box 1148
Winter Park, FL 32790-1148

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

Nancy B. White

(at)

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 14, 1993
Company (Formerly FPSC Docket)	
Number 880069-TL))	
)	

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
 RESPONSE AND OBJECTIONS TO STAFF'S
 EIGHTEENTH REQUEST FOR PRODUCTION OF DOCUMENTS
AND NOTICE OF INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION

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 Rule 1.350, Florida Rules of Civil Procedure, its Response and Objections to the Florida Public Service Commission Staff's ("Staff") Eighteenth Request for Production of Documents dated December 15, 1992 and (2) pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, its Notice of Intent to Request Confidential Classification.

NOTICE OF INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION

Some of the documents that will be produced for the Staff in response to its Eighteenth Request for Production of Documents contain information which is exempted from public disclosure pursuant to §§ 119.07 and 364.183, Florida Statutes.

Specifically, some of the documents contain, among other things, corporate tax return details, unregulated line of business data, and other proprietary confidential business information. This information is included as proprietary confidential business information under § 364.183, Florida Statutes and Rule 25-22.006, Florida Administrative Code. Because these documents contain exempt information, Southern Bell is filing this Notice of Intent

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to Request Confidential Classification, pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, in order to allow the Staff access to these documents without delay. The original of this Notice has been filed with the Division of Records and Reporting, and a copy has been served on the division requesting this information.

GENERAL RESPONSE AND OBJECTIONS

1. Southern Bell objects to Staff's definition of "document" or "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., 486 So. 2d 654 (Fla. App. 3rd District 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. Southern Bell objects to Public Counsel's requests on the basis that certain classes of documents requested are not relevant to the subject matter of this proceeding. Rule 1.280, Florida Rules of Civil Procedure, state that "parties may obtain discovery regarding any matter, not privileged, that is relevant to the subject matter of the pending action." This proceeding concerns Southern Bell's regulated earnings in the State of Florida. Therefore, any and all data regarding Southern Bell's operations in other states, some information concerning other

affiliated companies (which, in addition to being irrelevant may also be proprietary) and some information concerning Southern Bell's unregulated services are not relevant to this proceeding and therefore are not the proper subject of discovery.

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

SPECIFIC RESPONSES

5. In response to Request No. 170, please refer to Southern Bell's response to the FPSC Staff's Second Production of Documents, Item 17.

6. In response to Request No. 171, please refer to Southern Bell's response to the FPSC Staff's Second Production of Documents, Item 20.

7. In response to Request No. 172, please refer to Southern Bell's response to the FPSC Staff's Second Production of Documents, Item 45.

8. In response to Request No. 173, please refer to Southern Bell's response to the FPSC Staff's Second Production of Documents, Item 55.

9. In response to Request No. 174, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place. Southern Bell objects to this request on the grounds that the documents contain proprietary and confidential business information that consists of among other things corporate tax return details.

10. In response to Request No. 175, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

11. In response to Request No. 176, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place. Southern Bell objects to this request on the grounds that the documents contain proprietary and confidential business information that consists of among other things unregulated line of business data.

12. In response to Request No. 177, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

13. In response to Request No. 178, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

14. In response to Request No. 179, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

15. In response to Request No. 180, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

16. In response to Request No. 181, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

17. In response to Request No. 182, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

18. In response to Request No. 183, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

19. In response to Request No. 184, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

20. In response to Request No. 185, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

21. In response to Request No. 186, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

22. In response to Request No. 187, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

23. In response to Request No. 188, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

24. In response to Request No. 189, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

25. In response to Request No. 190, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

26. In response to Request No. 192, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

27. In response to Request No. 193, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

28. In response to Request No. 194, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

29. In response to Request No. 195, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

30. In response to Request No. 196, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

31. In response to Request No. 197, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

32. In response to Request No. 198, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place. Also refer to Southern Bell's response to Item 175 and 197.

33. In response to Request No. 199, Southern Bell has no documents responsive to this request.

34. In response to Request No. 200, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

35. In response to Request No. 201, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

36. In response to Request No. 202, please refer to Southern Bell's response to Item 175.

37. In response to Request No. 203, please refer to Southern Bell's response to Item 175.

38. In response to Request No. 204, please refer to Southern Bell's response to Items 192-196 of this request.

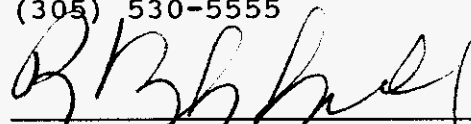
39. In response to Request No. 205, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

Respectfully submitted this 14th day of January, 1993.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY



HARRIS R. ANTHONY
J. PHILLIP CARVER
c/o Marshall M. Criser
400 - 150 South Monroe Street
Tallahassee, Florida 32301
(305) 530-5555



R. DOUGLAS LACKEY
NANCY B. WHITE
4300 - 675 West Peachtree St., N.E.
Atlanta, Georgia 30375
(404) 529-5387