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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 Sixteenth Request for Production of Documents and Notice of 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. Copies have been served on the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White
Nancy B. White
(WJ)

Enclosures

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

DOCUMENT NUMBER-DATE

00532 JAN 14 83

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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 14th day of January, 1993 to:

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Nancy B. White
(22)

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
 SIXTEENTH 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") Sixteenth Request for Production of Documents dated December 10, 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 Sixteenth 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, forecast of usage revenues and expenses of competitive services, 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. The following Specific Responses are given subject to the above-stated General Responses and Objections.

SPECIFIC RESPONSES

4. In response to Request No. 160, Southern Bell objects to this request on the grounds that it is voluminous, burdensome and oppressive. The requested documents exist in Jacksonville, Miami and Birmingham and consist of approximately 14,000 pages of material. In addition some of these documents contain proprietary, confidential business information concerning

forecasts of usage of services subject to competition in the state of Florida. Southern Bell will make the requested documents available in their offices in the cities where the information is filed.

5. In response to Request No. 161, Southern Bell objects to this request on the grounds that it is voluminous, burdensome and oppressive. The requested documents exist in Jacksonville, Miami and Birmingham and consist of approximately 14,000 pages of material. In addition some of these documents contain proprietary, confidential business information concerning forecasts of usage of services subject to competition in the state of Florida. Southern Bell will make the requested documents available in their offices in the cities where the information is filed.

6. In response to Request No. 162, Southern objects to this request on the grounds that it is voluminous, burdensome and oppressive. The requested documents consist of approximately 8,000 pages of documents located in Miami. In addition some of these documents contain proprietary, confidential business information concerning forecasts of revenues and expenses of services subject to competition in the state of Florida. Southern will make the requested documents available in its offices in Miami where the information is filed.

7. In response to Request No. 163, Southern Bell has no documents responsive to this request.

8. In response to Request No. 164, Southern Bell has no documents responsive to this request.

Respectfully submitted this 14th day of January, 1993.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY



HARRIS R. ANTHONY *(RR)*

J. PHILLIP CARVER

c/o Marshall M. Criser

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