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January 15, 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 Seventeenth 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,

*Nancy B. White*  
Nancy B. White

ACK     
AFA   3    
AFP     
CAF   

Enclosures

CC: All Parties of Record

CTB    A. M. Lombardo  
H. R. Anthony  
EAR    R. D. Lackey

LEE   1/15/93  

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CFB   

RF   

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DOCUMENT NUMBER-DATE

00593 JAN 15 93

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE  
Docket No. 920260-TL

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I HEREBY CERTIFY that a copy of the foregoing has been furnished  
by United States Mail this 15th day of January, 1993 to:

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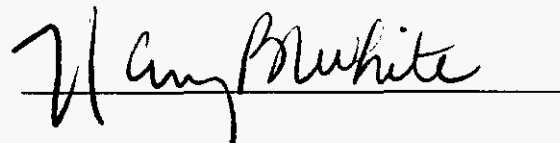
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\_\_\_\_\_

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 15, 1993  
Company (Formerly FPSC Docket )  
Number 880069-TL) )  
\_\_\_\_\_ )

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
RESPONSE AND OBJECTIONS TO STAFF'S  
SEVENTEENTH 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 (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") Seventeenth Request for Production of Documents dated December 11, 1992.

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.

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#### SPECIFIC RESPONSES

4. In response to Request No. 165, Southern will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place. Southern Bell objects to furnishing the request to the extent that these documents contain customer specific information which is considered proprietary and confidential information protected by Florida Statutes. In order to be responsive, Southern Bell will furnish the documents requested with the customer specific information redacted.

5. In response to Request No. 166, Southern will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place. Southern Bell objects to furnishing the request to the extent that these documents contain customer specific information which is considered proprietary and confidential information protected by Florida Statutes. In order to be responsive, Southern Bell will furnish the documents requested with the customer specific information redacted.

6. In response to Request No. 167, Southern will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place. Southern Bell objects to furnishing the request to the extent that these documents contain customer specific information which is considered proprietary and confidential information protected by Florida Statutes. In order to be responsive, Southern Bell will

furnish the documents requested with the customer specific information redacted.

7. In response to Request No. 168, Southern will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

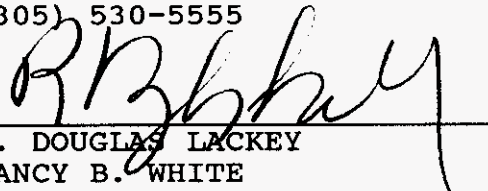
8. In response to Request No. 169, Southern will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

Respectfully submitted this 15th day of January, 1993.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY



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