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February 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. 8 [REDACTED]

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Amended Response to Order No. PSC-93-0071-PCO-TL and Motion for Temporary 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

Enclosures

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

ACK _____
AEA 1 _____
APP _____
CIT _____
1 _____

SR 1 _____
WAS _____
DTH *Kay* _____

[Handwritten signature]

DOCUMENT NUMBER-DATE
01537 FEB-88
PSC-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 February, 1993 to:

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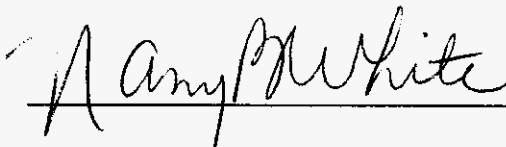
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of)
the Revenue Requirements and Rate) Docket No. 920260-TL
Stabilization Plan of Southern)
Bell Telephone and Telegraph) Filed: February 8, 1993
Company (Formerly FPSC Docket)
Number 880069-TL))
_____)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
AMENDED RESPONSE TO ORDER NO. PSC-93-0071-PCO-TL
AND MOTION FOR TEMPORARY PROTECTIVE ORDER

COMES NOW BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), and files (1) its amended response to Order No. PSC-93-0071-PCO-TL and (2) its Motion for Temporary Protective Order, pursuant to Rule 25-22.006, Florida Administrative Code.

1. During the course of the above-captioned proceeding, the Office of Public Counsel ("Public Counsel") has filed numerous discovery requests in the form of interrogatories and requests for production upon Southern Bell. In the course of responding to these discovery requests, Southern Bell objected to Public Counsel's attempt to obtain discovery from BellSouth Corporation. Southern Bell also objected to production of information regarding states other than Florida and regarding unregulated activities. Public Counsel filed Motions to Compel the production of this information.

2. On January 15, 1993, the Prehearing Officer in this case granted these Motions to Compel. The Prehearing Officer ordered Southern Bell to produce BellSouth Corporation documents responsive to Public Counsel's discovery, as well as to unredact the information regarding operations in states other than Florida

and information regarding unregulated activities. Southern Bell was further ordered to produce such documents by February 4, 1993. Southern Bell filed its Response to Order No. PSC-93-0071-PCO-TL on February 4, 1993.

3. Southern Bell in its original response, stated that it had gathered the documents in accordance with the Prehearing Officer's order and that a review by Public Counsel had been scheduled. Inadvertently, Southern Bell failed to state that there existed BellSouth Corporation documents covered by the attorney/client or attorney work product privilege or both. Southern Bell objects to production of those documents so covered. These documents consist of evaluations of the legal and tax ramifications of possible business reorganizations. The documents contain opinion work product and the mental impressions of the attorney-authors.

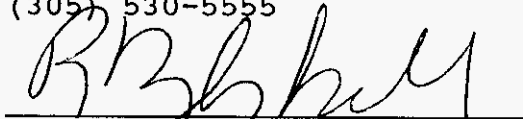
WHEREFORE, based on the foregoing, Southern Bell moves the Prehearing Officer to enter a temporary protective order that discovery not be had with respect to these documents in connection with Order No. PSC-93-0071-PCO-TL.

Respectfully submitted this 8th day of February, 1993.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY



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