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February 22, 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, 900960-TL, 910163-TL, 910727-TL

Dear Mr. Tribble:

Enclosed is an original and fifteen copies of a Southern Bell Telephone and Telegraph Company's Response and Objections to Public Counsel's Twenty-Seventh Request for Production of Documents and Motion for Temporary Protective Order. Please file this document in the above-captioned dockets.

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

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

ACK ✓  
 AFA ✓  
 APP ✓  
 CAF ✓  
 CMU ✓  
 CTR ✓  
 EAG ✓  
 LEG ✓  
 LIN ✓ *l.w/m*  
 OPC ✓  
 RCH ✓  
 SEC ✓  
 WAS ✓  
 OTH ✓ *dkf*  
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**CERTIFICATE OF SERVICE**

**Docket No. 920260-TL**

**Docket No. 900960-TL**

**Docket No. 910163-TL**

**Docket No. 910727-TL**

I HEREBY CERTIFY that a copy of the foregoing has been  
furnished by United States Mail this 22nd day of February, 1993  
to:

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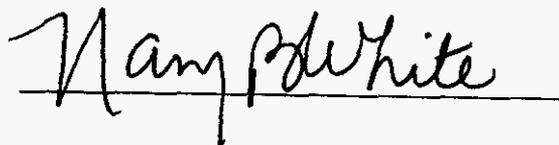
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Nancy DeWite



available for review by Public Counsel contain proprietary, confidential business information that should not be publicly disclosed. Thus, pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, Southern Bell moves the Prehearing Officer to issue a Temporary Protective Order exempting these documents from § 119.07(1), Florida Statutes. These documents contain, among other things, financial information, non-regulated competitive information, and other proprietary confidential business information. Such information is specifically included as proprietary confidential business information pursuant to § 364.183, Florida Statutes. If Public Counsel subsequently notifies Southern Bell that any of the proprietary documents are to be used in a proceeding before the Commission, Southern Bell will, in accordance with Rule 25-22.006, Florida Administrative Code, file a detailed motion for protective order specifically addressing each of the documents identified.

#### GENERAL RESPONSES AND OBJECTIONS

1. Southern Bell objects to Public Counsel's proposed "Instruction" relating to details of privileged documents. To the extent a document responsive to any of the requests is subject to an applicable privilege, some of the information requested by Public Counsel would be similarly privileged and therefore not subject to discovery.
2. Southern Bell objects to Public Counsel's definition of "document" or "documents." Public Counsel'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).

3. Southern Bell does not believe it was Public Counsel'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.

4. Southern Bell objects to the specific time and place designated by Public Counsel for the production of documents for the reasons that the designation is not reasonable, but has no objection to producing the documents that are responsive and to which no other objection is made, at a mutually agreed upon time and place.

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

#### SPECIFIC RESPONSES

6. With respect to Request No. 357, Southern Bell will produce responsive documents it has in its possession, custody, or control at a mutually convenient time and place, subject to the Motion for Temporary Protective Order filed herein.

7. With respect to Request No. 358, Southern Bell will produce responsive documents it has in its possession, custody, or control at a mutually convenient time and place, subject to the Motion for Temporary Protective Order filed herein.

8. With respect to Request No. 359, Southern Bell will

produce responsive documents it has in its possession, custody, or control at a mutually convenient time and place, subject to the Motion for Temporary Protective Order filed herein.

9. With respect to Request No. 360, Southern Bell will produce responsive documents it has in its possession, custody, or control at a mutually convenient time and place, subject to the Motion for Temporary Protective Order filed herein.

10. With respect to Request No. 361, Southern Bell will produce responsive documents it has in its possession, custody, or control at a mutually convenient time and place, subject to the Motion for Temporary Protective Order filed herein.

11. With respect to Request No. 362, Southern Bell will produce responsive documents it has in its possession, custody, or control at a mutually convenient time and place, subject to the Motion for Temporary Protective Order filed herein. In addition, Southern Bell refers Public Counsel to Public Counsel's First Production of Documents, Item No. 1, Docket No. 920385-TL.

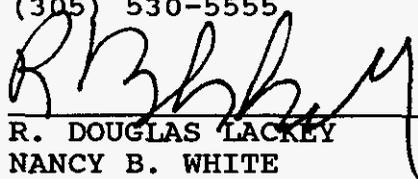
12. With respect to Request No. 363, Southern Bell will produce responsive documents it has in its possession, custody, or control at a mutually convenient time and place, subject to the Motion for Temporary Protective Order filed herein.

13. With respect to Request No. 364, Southern Bell will produce responsive documents it has in its possession, custody, or control at a mutually convenient time and place, subject to the Motion for Temporary Protective Order filed herein.

Respectfully submitted this 22nd day of February, 1993.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY

  
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