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ORIGINAL  
FILE COPY

May 27, 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 Staff's Twentieth Request for Production of Documents. 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 (ej)

- ACK
- AFM
- AFR
- CFE
- CTM
- CTP

Enclosures

- EPSC cc: All Parties of Record
- LEA 1 *n/m* A. M. Lombardo
- LEB 1 H. R. Anthony
- LEK 6 R. D. Lackey
- OPR
- ROA
- SEC
- WAS
- OTH

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FLORIDA PUBLIC SERVICE COMMISSION

**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 27th day of May, 1993 to:

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Nancy B. White  
(02)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of the Revenue Requirements and Rate Stabilization Plan of Southern Bell Telephone and Telegraph Company )

) Docket No. 920260-TL

ORIGINAL FILE COPY

In re: Show cause proceeding against Southern Bell Telephone and Telegraph Company for misbilling customers )

) Docket No. 900960-TL

In re: Petition on behalf of Citizens of the State of Florida to initiate investigation into integrity of Southern Bell Telephone and Telegraph Company's repair service activities and reports )

) Docket No. 910163-TL

In re: Investigation into Southern Bell Telephone and Telegraph Company's compliance with Rule 25-4.110(2), F.A.C., Rebates )

) Docket No. 910727-TL

) Filed: May 27, 1993

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S RESPONSE AND OBJECTIONS TO STAFF'S TWENTIETH 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, 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") Twentieth Request for Production of Documents dated April 27, 1993.

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).

DOCUMENT NUMBER-DATE

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FILED RESPONSE/REPORTING

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.

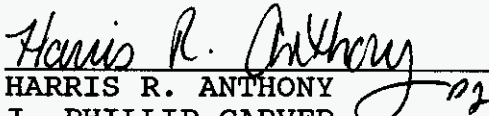
3. The following Specific Responses are given subject to the above-stated General Responses and Objections.


SPECIFIC RESPONSES

4. In response to Request No. 207, Southern Bell refers Staff to Southern Bell's response to Staff's First Request for Production of Documents, Item No. 18 in Docket 920385-TL. This material is protected by a Request for Confidential Classification filed by Southern Bell on September 25, 1992 in Docket No. 920385-TL. Confidentiality was granted by the Prehearing Officer in Order No. PSC-93-040-CFO-TL, rendered on February 15, 1993.

Respectfully submitted this 27th day of May, 1993.

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