

ORIGINAL
FILE COPY

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August 3, 1993

Mr. Steve Tribble
Director, Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

Re: Docket No. [REDACTED]

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Response and Objection to Staff's First Request for Production of Documents. Please file this document in the above-captioned docket.

ACK

AFB

APC

CSE

CMU

CTR

EAG

LES

LPI

OT

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,

David M. Falgoust
David M. Falgoust (PF)

Enclosures

REC: All Parties of Record

SEC / A. M. Lombardo

H. R. Anthony

WAS - R. D. Lackey

OTH

RECEIVED & FILED

[Signature]
FPSC BUREAU OF RECORDS

A BILLSOUTH Company

DOCUMENT NUMBER-DATE

08364 AUG-38

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 921074-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 3rd day of August 1993,
to:

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David M. Salquist
(02)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of INTERMEDIA)
COMMUNICATIONS OF FLORIDA, INC.) Docket No. 921074-TP
for expanded interconnection for)
AAVs within LEC central offices) Filed: August 3, 1993
_____)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
RESPONSE AND OBJECTION TO STAFF'S
FIRST 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 Objection to the Florida Public Service Commission Staff's ("Staff") First Request for Production of Documents dated June 29, 1993.

GENERAL RESPONSE AND OBJECTION

1. Southern Bell objects to producing any document that would constitute an attorney-client communication which is privileged or any document constituting attorney work product.

SPECIFIC RESPONSES

2. Subject to the foregoing general response and objection, Southern Bell offers the following specific response to Staff's First Request for Production of Documents.

DOCUMENT NUMBER-DATE

08364 AUG-38

FPSC-RECORDS/REPORTING

3. Because the information requested in Request for Production of Documents No. 1 has already been provided to the Commission in its original form, Southern Bell does not possess the original documents and will, therefore, produce copies of the documents requested in lieu of originals.

Respectfully submitted this 3rd day of August, 1993.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY

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