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Public Service Commission

September 20, 1993

Ms. Nancy B White
General Attorney
Southern Bell Telephone
and Telegraph Company
Suite 400
150 South Monroe Street
Tallahassee, Florida 32301

RE: Docket No. 920260-TL

Dear Ms. White:

Upon review of Southern Bell's responses to Staff's Thirtieth Set of Interrogatories and Twenty-first Request for Production of Documents, Staff has noted the following deficiencies:

Staff's Thirteenth Set of Interrogatories

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- LIN _____
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

In response to Interrogatory No. 556, Bell provided its calculation for the "quantity effects" due to stimulation. The interrogatory actually asked for a mathematic calculation of each of the average one year elasticities, not the stimulation effects. The short run and one-year average elasticities were reportedly derived by applying statistically generated weights to a statistically generated long-run elasticity. I would appreciate it if you would provide this calculation at your earliest convenience.

In response to Interrogatory No. 563, Bell referred Staff to its response to Interrogatory No. 552. That response does not indicate whether the data are in real or nominal terms. Please identify each column in RESMTS.WK1 and BUSMTS.WK1 and indicate whether the column is in real or nominal terms.

Staff's Twenty-first Request For Production

Item No. 210: With regard to "MTS Demand", Bell responded that the data series cannot be updated because STARS is no longer available. However, Bell has provided similar

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information, apparently derived from different sources, in response to other discovery (i.e., Bell's response to Staff Interrogatory No. 371). Can this series be updated using another source? If yes, I would appreciate it if you would provide the update at your earliest convenience.

With regard to "Real Own Price", Bell responded that a Honeywell mainframe program is no longer available. Staff has informed me, however, that calculating this series does not require a mainframe computer. Please let me know whether this series can be updated through alternative source(s) and if so, when it can be provided.

As for "Megacom Price", Bell's response was that the index has not been maintained. Again, I would appreciate it if you would let me know whether it can be updated and if so, when Staff can expect to receive it.

Item No. 213: In its response to this request, Bell only provided data for the period January, 1984 through May, 1993. Staff's request asked for the intraLATA MTS MOU from 1980 to the present. I would appreciate it if you would either indicate that the data do not exist or provide the data from 1980 to 1984.

Items Nos. 215 & 216: As with the above, Staff requested that information be provided from 1980 to the present. Staff requested the information for that period because Bell filed certain models using data from 1980 to the present. In response, Bell stated that the information is "not readily available" for the period between 1980 and 1986. Please let me know whether the data are available for the period 1980 through 1986 and if and when Bell will provide the data as requested.

Please let me know whether you have any questions regarding the above and thank you for your consideration of this matter.

Sincerely,



Robert J. Pierson
Staff Counsel

RJP/clp