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ORIGINAL
FILE JPY

September 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

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Response and Objections to Staff's Twenty-Fifth Request for Production of Documents and Notice of Intent to Request Confidential Classification. 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.

ACK ✓
AFA 1
APP _____
CSE _____
CMU _____

Sincerely,

Nancy B. White
Nancy B. White

Enclosures

cc: All Parties of Record
LEG L M. Lombardo
H. R. Anthony
LPI 6 R. D. Lackey
OPD _____
RCH _____
SEC 1
WAS _____
OTH KS

DOCUMENT NUMBER-DATE
10280 SEP 23 83
FPSC-RECORDS/REPORTING

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 September, 1993
to:

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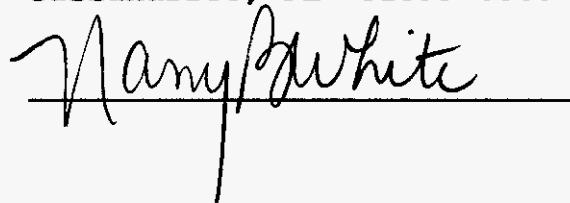
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL
FILE COPY

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

Docket No. 920260-TL

Filed: September 22, 1993

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
RESPONSE AND OBJECTIONS TO STAFF'S TWENTY-FIFTH REQUEST
FOR PRODUCTION OF DOCUMENTS AND NOTICE OF INTENT
TO REQUEST CONFIDENTIAL CLASSIFICATION

COMES NOW BellSouth Telecommunications, Inc. d/b/a Southern
Bell Telephone and Telegraph Company ("Southern Bell" or
"Company"), and files (1) pursuant to Rule 25-22.034, Florida
Administrative Code, and Rule 1.350, Florida Rules of Civil
Procedure, its Response and Objections to Staff's Twenty-Fifth
Request for Production of Documents dated August 18, 1993 and (2)
pursuant to Rule 25-22.006, Florida Administrative Code, its
Notice of Intent to Request Confidential Classification.

NOTICE OF INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION

Some of the documents that will be produced for the Staff in
response to its Twenty-Fifth Request for Production of Documents
contain information which is exempted from public disclosure
pursuant to §§ 119.07 and 364.183, Florida Statutes.

Specifically, some of the documents contain, among other things,
demand and price data for competitive services and other
proprietary confidential business information. This information
is included as proprietary confidential business information
under § 364.183, Florida Statutes and Rule 25-22.006, Florida
Administrative Code. Because these documents contain exempt
information, Southern Bell is filing this Notice of Intent to
Request Confidential Classification, pursuant to Rule 25-

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22.006(3)(a), Florida Administrative Code, in order to allow the Staff access to these documents without delay. The original of this Notice has been filed with the Division of Records and Reporting, and a copy has been served on the division requesting this information.

GENERAL RESPONSE AND OBJECTIONS

1. Southern Bell objects to Staff's definition of "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.*, 46 So. 2d 654 (Fla. App. 3rd Dist. 1986).

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 Response and Objections.

SPECIFIC RESPONSES

4. With respect to Request No. 231, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

5. With respect to Request No. 232, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

6. With respect to Request No. 233, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

7. With respect to Request No. 234, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

8. With respect to Request No. 235, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

9. With respect to Request No. 236, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

10. With respect to Request No. 237, Southern Bell refers Staff to Staff's Twenty-Second Request for Production of Documents, Item No. 223.

11. With respect to Request No. 238, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

12. With respect to Request No. 239, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

13. With respect to Request No. 240, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

14. With respect to Request No. 241, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

15. With respect to Request No. 242, Southern Bell has no documents responsive to this request and refers Staff to Southern Bell's response to Item No. 644(a) of Staff's Thirty-Fourth Set of Interrogatories.

16. With respect to Request No. 243, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place subject to the Notice of Intent to Request Confidential Classification.

17. With respect to Request No. 244, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.


18. With respect to Request No. 245, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

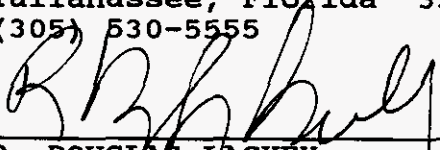
19. With respect to Request No. 246, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

20. With respect to Request No. 247, Southern Bell has no documents responsive to this request.

Respectfully submitted this 22nd day of September, 1993.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY


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