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SCANNED

Legal Department

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ORIGINAL
FILE COPY

September 24, 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 is an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Amended Response and Objections to Staff's Twenty-Second 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.

Sincerely,

Nancy B. White
Nancy B. White

ACK _____
AFA 2
APP _____
CAF _____
CMU _____
CTR _____ Enclosures
EAG _____
LEG HW-dano
LIN 6
OPC _____
RCH _____
SEC 1
WAS _____

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

OTH *Kathleen*
RECEIVED & FILED
[Signature]

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
10349 SEP 27 83
FPSC-RECORDS/REPORTING

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 (Formerly FPSC Docket)
Number 880069-TL))
_____)

Docket No. 920260-TL
Filed: September 24, 1993

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
AMENDED RESPONSE AND OBJECTIONS TO STAFF'S
TWENTY-SECOND 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 (1) files pursuant to Rule 25-22.034, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, its Amended Response and Objections to Item No. 224 of the Florida Public Service Commission Staff's ("Staff") Twenty-Second Request for Production of Documents dated July 20, 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-Second 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, the forecast of personnel reengineering 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-

DOCUMENT NUMBER-DATE

10349 SEP 27 93

FPSC-RECORDS/REPORTING

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. With regard to Staff's definition of "document" or "documents", Southern Bell has made a diligent, good faith attempt to locate documents responsive to the scope of Staff's individual requests for documents.

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 RESPONSE

4. With respect to Request No. 224, Southern Bell refers Staff to Southern Bell's response No. 88 to Staff's Thirtieth Request for Production of Documents and Exhibit No. JDM-3 of Mr. McClellan's testimony.

Respectfully submitted this 24th day of September, 1993.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY

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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 24th day of September, 1993
to:

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