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ORIGINAL
FILE COPY

December 8, 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 Florida Interexchange Carrier Association's Fourth Request for Production of Documents. Please file these documents in the 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 (NW)
Nancy B. White

Enclosures

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

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

RECEIVED & FILED

DOCUMENT NUMBER-DATE

13123 DEC-8 93

EPSC-BUREAU OF RECORDS

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)
_____)

Docket No. 920260-TL
Filed: December 6, 1993

SOUTHERN BELL'S RESPONSE AND OBJECTIONS TO
FLORIDA INTEREXCHANGE CARRIER ASSOCIATION'S
FOURTH 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 Rules 1.280(c) and 1.350 of the Florida Rules of Civil Procedure, its Responses and Objections to the Florida Interexchange Carrier Association's ("FIXCA") Fourth Request for Production of Documents dated November 8, 1993.

GENERAL RESPONSE AND OBJECTIONS

1. Southern Bell objects to FIXCA's definition of "document" or "documents". Public Counsel'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).

2. Southern Bell objects to FIXCA's instruction relating to the details of privileged documents. To the extent production is objected to due to the privileged nature of documents, the information suggested by FIXCA would similarly be privileged and is therefore prohibited.

3. Southern Bell objects to the instruction as to information that is to be provided for any document not in the possession of Southern Bell. This request for an extensive

DOCUMENT NUMBER-DATE
13123 DEC-83
FPSC-RECORDS/REPORTING

narrative as to the "disposition" of these documents is not properly encompassed with a Request for Production, and is, further, unreasonable and burdensome.

SPECIFIC RESPONSES

4. With respect to Request No. 15, Southern Bell objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence related to the subject of this docket.

5. With respect to Request No. 16, Southern Bell objects to this request on the grounds that it is overly broad, unduly burdensome, and oppressive. For further detail, Southern Bell refers FIXCA to Southern Bell's response to Interrogatory No. 57 of FIXCA's Sixth Set of Interrogatories.

Respectfully submitted this 6th day of December, 1993.

SOUTHERN BELL TELEPHONE
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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 8th day of December, 1993 to:

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