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ORIGINAL
FILE COPY

December 14, 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. 820260-PL

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Amended Response and Objections to Staff's Thirty-First 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
Nancy B. White *mw*

ACK /

AFA 1

APP Enclosures

CAF cc: All Parties of Record

 CJU A. M. Lombardo

 H. R. Anthony

CTR R. D. Lackey

EAC

LRS 1

LDN 6

CRS

RCS

SAS 1

SIS

SMW

DOCUMENT NUMBER-DATE
13319 DEC 14 83
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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 14, 1993

ORIGINAL
FILE COPY

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
AMENDED RESPONSE AND OBJECTIONS TO STAFF'S
THIRTY-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 Amended Response and Objections to Item No. 289 of the Florida Public Service Commission Staff's ("Staff") Thirty-First Request for Production of Documents dated November 12, 1993.

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.

DOCUMENT NUMBER-DATE

13319 DEC 14 83

FPSC-RECORDS/REPORTING

SPECIFIC RESPONSE

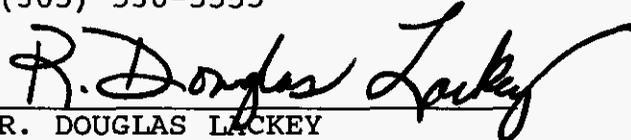
4. With respect to Request No. 289, Southern Bell refers Staff to Southern Bell's response to Item Nos. 1128 and 1129 of Public Counsel's Forty-Fourth Set of Interrogatories for the calculation of the 1992 losses, as well as the 1993 losses. The 4000 lines mentioned due to Homestead Air Base was calculated based on half a year effect at \$59.75 each, which equaled \$1,434,000 (rounded to \$1.5 million for 1993 plus \$3.6 million for access lines not gained in 1992 equaled \$5.1 million for 1993).

Respectfully submitted this 14th day of December, 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 14th day of December, 1993
to:

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