

BEFORE
THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Expanded Interconnection) DOCKET NO. 921074-TP
Phase II and Local Transport)
Restructure)
_____) APRIL 7, 1994

SOUTHERN BELL TELEPHONE AND TELEGRAPH
COMPANY'S OBJECTIONS AND RESPONSES TO STAFF'S
SECOND 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 Procedures, its Objections and Responses to Florida Public Service Commission Staff's ("Staff") Second Request for Production of Documents dated February 14, 1994.

General Responses and Objections

1. Southern Bell objects to Staff's definition of "document" or "documents". Staff's definition of these is overly broad and objectionable pursuant to the standards adopted in Caribbean Security Systems v. Security Control Systems, Inc., 486 S.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 documents, 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.

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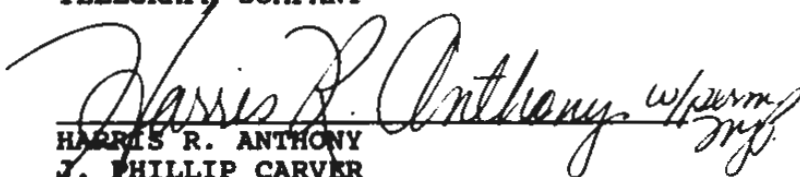
3. The following specific responses are subjected to the above stated general responses and objections.

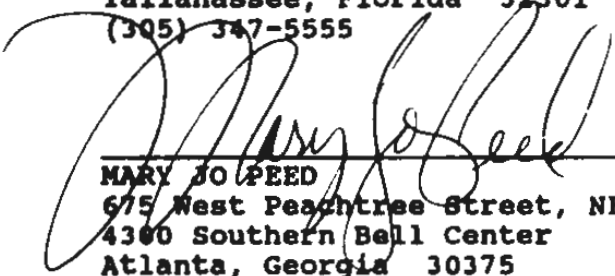
Specific Responses

4. In response to Request Nos. 17 and 18, Southern Bell will produce the documents responsive to both requests. Southern Bell further responds, however, that it maintains continuing property records by geographic location and the documents produced will not reveal property additions and deletions to specific switches residing at a particular geographic location.

Respectfully submitted this 7th day of April, 1994.

ATTORNEYS FOR
BELLSOUTH TELECOMMUNICATIONS, INC.
d/b/a SOUTHERN BELL TELEPHONE AND
TELEGRAPH COMPANY


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THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Expanded Interconnection) DOCKET NO. 921074-TP
Phase II and Local Transport)
Restructure)

) APRIL 7, 1994

SOUTHERN BELL TELEPHONE AND TELEGRAPH
COMPANY'S SECOND 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 pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, its Second Notice of Intent to Request Confidential Classification.

1. On March 3, 1994, the Staff of the Florida Public Service Commission ("Commission Staff") filed its Second Set of Interrogatories and Second Request for Production of Documents to Southern Bell. Southern Bell's response to Request No. 17 of the Second Set of Interrogatories contains information which is exempted from public disclosure pursuant to §§ 119.07 and 364.183, Florida Statutes. Specifically, the interrogatory response contains, among other things, information concerning contractual data, the disclosure of which would impair the efforts of the Company or its affiliates to contract for goods or services on favorable terms, customer specific information and other proprietary confidential business information. The information is included as proprietary confidential business

information under Section 364.138, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

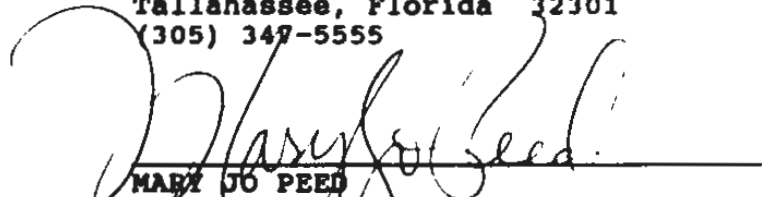
2. Because the interrogatory response contains exempt information, Southern Bell is filing this Notice of Intent to Request Confidential Classification pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, in order to allow the Staff access to the interrogatory response without delay. The original of this Notice has been filed with the Division of Records and Reporting and a copy of has been served on the Division requesting this information.

Respectfully submitted this 7th day of April, 1994.

ATTORNEYS FOR
BELLSOUTH TELECOMMUNICATIONS, INC.
d/b/a SOUTHERN BELL TELEPHONE AND
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CERTIFICATE OF SERVICE
Docket No. 921074-TP

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 7th day of April, 1994,

to:

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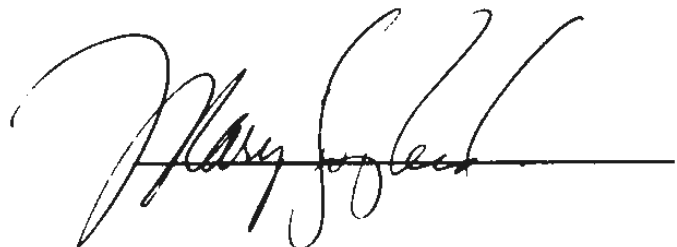
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A handwritten signature in cursive script, appearing to read "Mary Jones", is written over a horizontal line.