

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: June 30, 1995

SOUTHERN BELL'S RESPONSE AND OBJECTIONS TO
FLORIDA INTEREXCHANGE CARRIER ASSOCIATION'S
SIXTH REQUEST FOR PRODUCTION OF DOCUMENTS
AND MOTION FOR PROTECTIVE ORDER

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 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") Sixth Request for Production of Documents dated May 31, 1995, and (2) Motion for Protective Order.

GENERAL RESPONSE AND OBJECTIONS

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

DOCUMENT NUMBER-DATE

06233 JUN 30 95

FPSC-RECORDS/REPORTING

3. Southern Bell objects to producing some of the documents requested by FIXCA on the basis that the documents sought contain proprietary and confidential business information regarding, among other things, Southern Bell's revenues on a route specific basis. Consequently, Southern Bell moves the Prehearing Officer to issue a Protective Order directing that discovery not be had with respect to the proprietary and confidential business documents referenced more specifically herein, or that discovery only be had under certain conditions. Southern Bell would be willing to entertain negotiations regarding producing certain of these documents to the attorneys representing FIXCA upon the execution of an appropriate protective agreement.

SPECIFIC RESPONSES

4. With respect to Request No. 19, Southern Bell objects to producing the documents requested on the basis that the documents responsive to this request contain proprietary and confidential business information regarding Southern Bell's revenues specific to each route. Consequently, Southern Bell moves for a Protective Order as set forth herein. In the alternative, the production of such documents should occur only after the execution of an acceptable protective agreement.

Respectfully submitted this 30th day of June, 1995.

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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 30th day of June, 1995 to:

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