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July 10, 1995

Mrs. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

RE: Docket No. 920260-TL

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Responses and Objections to McCaw's Second Set of Interrogatories and Second Set of Requests 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 02

- ACK
- AFA 2
- APP _____
- CAE _____
- CMR Proctor
- CTR _____
- EAG _____
- LEG 1
- LIN 5
- CPC _____
- RCH Vinger
- SEC 1
- WAS _____
- OTU _____

Enclosures

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
R. D. Lackey

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
06496 JUL 10 95
FPSC-RECORDS/REPORTING

ORIGINAL
FILE COPY

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: July 10, 1995

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S RESPONSES
AND OBJECTIONS TO MCCAW'S SECOND SET OF INTERROGATORIES
AND SECOND SET OF REQUESTS 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 Second Set of Interrogatories and the Second Request for Production of Documents dated June 9, 1995, submitted by McCaw Communications of Florida, Inc. ("McCaw").

SPECIFIC OBJECTIONS

1. With respect to Interrogatory Nos. 20-30, Southern Bell objects on the ground that these requests seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence related to the appropriate disposition of the \$25 Million revenue reduction that is the subject of this docket. Moreover, Southern Bell objects to these requests on the ground that the interrogatories are nothing more than an attempt by McCaw to conduct post-hearing discovery in Docket No. 940235-TL, the mobile interconnection docket. Such discovery is not permitted by the Florida Public Service Commission rules. In addition, the questions contained in McCaw's Second Set of interrogatories have previously been

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responded to in Docket No. 940235-TL. McCaw's attempt to have those responses introduced into this docket by means of discovery is improper.

2. With respect to Request for Production Item Nos. 22-32, Southern Bell objects on the ground that these requests seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence related to the appropriate disposition of the \$25 Million revenue reduction that is the subject of this docket. Moreover, Southern Bell objects to these requests on the ground that the production of documents are nothing more than an attempt by McCaw to conduct post-hearing discovery in Docket No. 940235-TL, the mobile interconnection docket. Such discovery is not permitted by the Florida Public Service Commission rules. In addition, McCaw's Second Request for Production of Documents contains specific requests that have been responded to by Southern Bell in Docket No. 940235-TL. McCaw's attempt to have those responses introduced into this docket by means of discovery is improper.

Respectfully submitted this 10th day of July, 1995.

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 10th day of July, 1995 to:

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