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July 14, 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 Objections to Florida Mobile Communications Association, Inc.'s First Request for Production of Documents and Motion for Protective Order. 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 (BW)

ma Enclosures

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

- ACK 1
- AFA 1
- APP _____
- CAF _____
- CMU ma
- CTR _____
- EAG _____
- LEG 1
- LIN 5
- OPC _____
- RCH Kim
- SEC 1
- WAS _____
- OTH _____

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DOCUMENT NUMBER-DATE
06680 JUL 14 95
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of)
the Revenue Requirements and Rate) Docket No. 920260-TL
Stabilization Plan of Southern)
Bell Telephone and Telegraph) Filed: July 14, 1995
Company)
_____)

SOUTHERN BELL'S RESPONSE AND OBJECTIONS TO
FLORIDA MOBILE COMMUNICATIONS ASSOCIATION, INC.'S
FIRST 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 Mobile Communications Association, Inc.'s ("FMCA") First Request for Production of Documents dated June 12, 1995, and (2) Motion for Protective Order.

GENERAL RESPONSE AND OBJECTIONS

1. Southern Bell objects to FMCA's definition of "document" or "documents". FMCA'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 FMCA'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 FMCA would similarly be privileged and is therefore prohibited.

DOCUMENT NUMBER-DATE

06680 JUL 14 88

FPSC-RECORDS/REPORTING

3. Southern Bell objects to producing some of the documents requested by FMCA 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 FMCA upon the execution of an appropriate protective agreement.

SPECIFIC RESPONSES

4. With respect to Request No. 1, 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.

5. With respect to Request No. 2, 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 14th 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 14th day of July, 1995 to:

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