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ORIGINAL  
FILE COPY

July 24, 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 Interexchange Carrier Association's Eighth 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

- CK
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- CTR
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- LEG 1
- LIN 5
- OPC
- RCH
- SEC I
- WAS
- DTH

Enclosures

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

*was*

DOCUMENT NUMBER-DATE  
07063 JUL 24 1995  
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: July 24, 1995

SOUTHERN BELL'S RESPONSE AND OBJECTIONS TO  
FLORIDA INTEREXCHANGE CARRIER ASSOCIATION'S  
EIGHTH 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") Eighth Request for Production of Documents dated June 26, 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

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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. 27, Southern Bell has no documents responsive to this request in its possession, custody, or control.

Respectfully submitted this 24th 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 24th day of July, 1995 to:

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