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August 14, 1996

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 BellSouth Telecommunications, Inc.'s Responses and Objections to AT&T Wireless Services of Florida, Inc.'s Fifth Request for Production of Documents, Nos. 35 through 51, dated July 15, 1996. Please file these documents in the above-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 yours,

Thomas B. Alexander (TW)
Thomas B. Alexander

Enclosures

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
W. J. Ellenberg

RECEIVED

FPSC-RECORDS/REPORTING

DOCUMENT NUMBER-DATE

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive review of) DOCKET NO. 920260-TL
revenue requirements and rate)
stabilization plan of Southern)
Bell Telephone and Telegraph)
Company) Filed: August 14, 1996
_____)

**BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSES AND
OBJECTIONS TO AT&T WIRELESS SERVICES OF FLORIDA, INC.'S
FIFTH REQUEST FOR PRODUCTION OF DOCUMENTS**

COMES NOW, BellSouth Telecommunications, Inc.,
("BellSouth" or the "Company"), and files, pursuant to Rule
25-22.034, Florida Administrative Code, its responses and
objections to the Fifth Request for Production of Documents
propounded by AT&T Wireless Services of Florida, Inc.
("AWS"):

GENERAL RESPONSE AND OBJECTIONS

1. BellSouth objects to AWS' definition of "document"
or "documents". AWS' 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. BellSouth objects to AWS' 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 AWS would similarly
be privileged and is therefore prohibited.

3. BellSouth objects to producing some of the
documents requested by AWS on the basis that the documents
sought contain proprietary and confidential business

information regarding, among other things, BellSouth's revenues and unit costs for competitive services. Consequently, BellSouth 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. BellSouth would be willing to entertain negotiations regarding producing certain of these documents to the attorneys representing AWS upon the execution of an appropriate protective agreement.

SPECIFIC RESPONSES

1. With respect to Request No. 35, BellSouth has no documents responsive to this request.

2. With respect to Request No. 36, BellSouth objects to producing some of the documents requested on the basis that some of the documents responsive to this request contain proprietary and confidential business information regarding BellSouth's revenues for competitive services. Consequently, BellSouth 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.

3. In response to Request No. 37, BellSouth will produce the responsive documents in its possession.

4. In response to Request No. 38, BellSouth will produce the responsive documents in its possession.

5. In response to Request No. 39, BellSouth will produce the responsive documents in its possession.

6. In response to Request No. 40, BellSouth will produce the responsive documents in its possession.

7. With respect to Request No. 41, BellSouth objects to producing the documents requested on the basis that the documents responsive to this request contain proprietary and confidential business information regarding BellSouth's unit costs for competitive services. Consequently, BellSouth 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.

8. In response to Request No. 42, BellSouth will produce the responsive documents in its possession.

9. In response to Request No. 43, BellSouth refers to documents provided in its response to Request No. 36.

(NOTE: there was not a Request No. 44.)

10. In response to Request No. 45, BellSouth refers to documents provided in its response to Request No. 36.

11. With respect to Request No. 46, BellSouth has no documents responsive to this request.

12. In response to Request No. 47, BellSouth will produce responsive documents in its possession.

13. In response to Request No. 48, BellSouth refers to documents provided in its response to Request No. 36.

14. With respect to Request No. 49, BellSouth has no

documents responsive to this request.

15. With respect to Request No. 50, BellSouth has no documents responsive to this request.

16. With respect to Request No. 51, BellSouth has no documents responsive to this request.

Respectfully submitted this 14th day of August, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.

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CERTIFICATE OF SERVICE
Docket No. 920260-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U. S. Mail this 14th day of August, 1996 to:

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* Rec'd Notice to Continue
Participation