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August 30, 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 Response and Objections to Sprint Communications Company Limited Partnership's First Request 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 (m)

- ACK ✓
- AFA 1 Enclosures
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU Noted
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 1
- LIN 5
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

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

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE  
09237 AUG 30 96  
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: August 30, 1996  
Company )  
\_\_\_\_\_ )

BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSE AND  
AND OBJECTIONS TO SPRINT COMMUNICATIONS COMPANY LIMITED  
PARTNERSHIP'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

COMES NOW BellSouth Telecommunications, Inc., ("BellSouth" or "Company"), hereby files, pursuant to Rule 25-22.034 and 25-22.035, Florida Administrative Code, and Rules 1.340 and 1.280(b), Florida Rules of Civil Procedure, hereby submits the following Response and Objections to Sprint Communications Company Limited Partnership's ("Sprint") First Request for Production of Documents dated July 31, 1996.

GENERAL OBJECTIONS

1. BellSouth objects to each and every request to produce to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that Sprint requests proprietary confidential business information which is not subject to the "trade secrets" privilege, BellSouth will make such information available to counsel for Sprint pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.

2. BellSouth is a large corporation with employees located in many different locations in Florida and in other states. In the course of its business, BellSouth creates countless documents that are not subject to Florida Public Service Commission or FCC

DOCUMENT NUMBER-DATE

09237 AUG 30 1996

FPSC-RECORDS/REPORTING

retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized.

Therefore, it is possible that not every document has been provided in response to these discovery requests. Rather, these responses provide all of the information obtained by BellSouth after a reasonable and diligent search conducted in connection with this discovery request. BellSouth has complied with Sprint's request that a search be conducted of those files that are reasonably expected to contain the requested information. To the extent that the discovery request purports to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

#### SPECIFIC RESPONSES

Subject to, and without waiver of, the foregoing general objections, BellSouth enters the following specific responses to Sprint's requests:

3. With respect to Request No. 1, BellSouth will produce responsive documents pursuant to a Protective Agreement in that such documents contain proprietary and confidential business information.

Respectfully submitted this 30th day of August, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.

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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 August, 1996 to:

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