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September 26, 1997

BY HAND DELIVERY

Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
4075 Esplanade Way, Room 110
Tallahassee, Florida 32399-0850

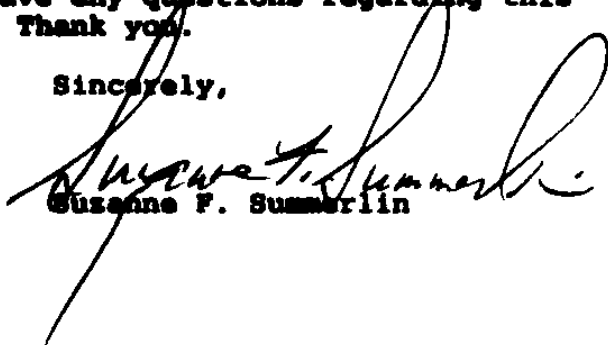
RE: Docket No. ~~920000-11~~

Dear Ms. Bayo:

Enclosed for filing is The Furst Group, Inc.'s "Objections to and Request for Clarification of Citizens' First Request for Production of Documents" in the above-referenced matter. As the Commission requires, the original and fifteen copies are enclosed. I have also enclosed an additional copy. Please stamp the additional copy and return it to me in the enclosed, self-addressed stamped envelope.

If you or your Staff have any questions regarding this filing, please contact me. Thank you.

Sincerely,



Suzanne F. Summerlin

BFS:ss
Enclosures (17)

- ACK
- AFA
- APP I
- CAF
- CMII
- CTR
- EAG
- LEG
- LIN 5
- OPC
- RCH
- SEC 1
- WAS
- OTH

DOCUMENT NUMBER-DATE
09888 SEP 26 5
FPSC-RECORDS/REPORTING

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

| | | |
|-----------------------------------|---|---------------------------|
| In Re: Proposed Rule 25-24.845, |) | DOCKET NO. 950709-TI |
| F.A.C., Customer Relations; Rules |) | |
| Incorporated, and proposed amend- |) | Filed: September 26, 1997 |
| ments to Rules 25-4.003, F.A.C., |) | |
| Definitions; 25-4.110, F.A.C., |) | |
| Customer Billing; 25-4.118, |) | |
| F.A.C., Interexchange Carrier |) | |
| Selection; 25-24.490, F.A.C., |) | |
| Customer Relations; Rules |) | |
| Incorporated. |) | |

**OBJECTIONS TO AND REQUEST FOR CLARIFICATION
OF CITIZENS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

The Furst Group, Inc., hereby gives notice of its objections to and request for clarification of the First Request for Production of Documents served by the Citizens and the Attorney General (hereinafter the "Citizens"), as follows:

1. The Furst Group, Inc., objects to providing information that has already been provided for the Citizens and the Staff of the Florida Public Service Commission in Docket No. 950709-TI. The Furst Group, Inc., produced a good deal of information in that proceeding and should not be required to produce it again.

2. The Furst Group, Inc., objects to producing information that is attorney-client privileged and work product privileged. The Furst Group, Inc., has been forced to file formal complaints against other companies in certain situations and has prepared a good deal of material in relation to these matters. This material is privileged. In addition, some material produced by The Furst Group, Inc., in these matters has been sealed by the appropriate jurisdictions.

3. The Furst Group, Inc., requests clarification that the Citizens' requests for production relate to Florida customer complaints only and information generated since January 1, 1996.

4. The Furst Group, Inc., notes that the requests for information by the Citizens are extremely broad and will cause The Furst Group, Inc., a great number of hours of employee time. For example, screening all of the Company's e-mail and all other documents to provide anything that might have anything to do with the subject of improper change of primary interexchange carriers is practically impossible. The Furst Group, Inc., does not have available the numbers of staff required to do such a project, especially within the time frame provided.

The Furst Group, Inc., will be able to produce responses to POD Requests Nos. 4, 5, 6, 9, 11, 12 and 13 by the deadline.

DOCUMENT NUMBER-DATE

09886 SEP 26 5


FPSC-RECORDS/REPORTING

1.

However, the other requests will take additional time. The Furst Group, Inc., will produce all of the information possible by the deadline. However, The Furst Group, Inc., requests a two week extension of time, or until October 30, 1997, to produce additional materials responsive to POD Requests Nos. 1, 2, 3, 7, 8, and 10.

The Furst Group, Inc., will make every effort to respond in a reasonable fashion and in good faith to the Citizens' requests for production of documents. To the extent that The Furst Group, Inc., has materials that it can reasonably locate that are responsive to the Citizens' requests, it will make every effort to produce these materials.

DATED this 20th day of September, 1997.


Suzanne Fannon Summerlin
Attorney for The Furst Group, Inc.
1311-B Paul Russell Road, Suite 201
Tallahassee, Florida 32301
(904) 656-2288
Florida Bar No. 398586

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to the following parties this 20th day of September, 1997.

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