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**ORIGINAL
FILE COPY**

June 24, 1991

Mr. Steve Tribble
Director, Division of Records and Reporting
Florida Public Service Commission
101 E. Gaines Street
Tallahassee, Florida 32301

Re: Docket No. 910163-TL
Public Counsel's Fourth Request
for Production of Documents

Dear Mr. Tribble:

Enclosed for filing in the above-referenced docket is the original and fifteen copies of Southern Bell Telephone and Telegraph Company's Response and Objections to Public Counsel's Fourth Request for Production of Documents and Southern Bell's Motion for a Temporary Protective Order. All parties of record have been served as indicated on the attached Certificate of Service.

A copy of this letter is enclosed. Please indicate on the copy that the original was filed and return the copy to me.

- ACK _____
- ADP _____
- APP _____
- CFE _____
- CS** _____
- CSA _____
- CSB _____
- CSM _____
- CSN _____
- CSO _____
- CSQ _____
- CSR _____
- CSU _____
- CSV _____
- CSW _____
- CSX _____
- CSY _____
- CSZ _____

Sincerely yours,

Harris R. Anthony
Harris R. Anthony

cc: All parties of record
Mr. A. M. Lombardo
Mr. R. Douglas Lackey

LW/m
6

RECEIVED & FILED

JD
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

06329 JUN 24 1991

CERTIFICATE OF SERVICE

DOCKET NO. 910163-TL

I HEREBY CERTIFY that a correct copy of foregoing was
furnished by U. S. Mail to the following parties this 24 day of
June, 1991.

Charles J. Beck, Esq.
Assistant Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, FL 32399-11400

Suzanne Summerlin, Esq.
Division of Legal Services
Florida Public Service Comm.
101 E. Gaines Street
Tallahassee, FL 32301

Harris R. Anthony

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition on behalf of Citizens)
of the State of Florida to initiate)
investigation into integrity of) Docket No. 910163-TL
Southern Bell Telephone and Telegraph)
Company's repair service activities) Filed: June 24, 1991
and reports.)
_____)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
RESPONSE AND OBJECTIONS TO PUBLIC COUNSEL'S
FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS AND
SOUTHERN BELL'S MOTION FOR A TEMPORARY PROTECTIVE ORDER

COMES NOW 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 Response and Objections to the Office of Public Counsel's ("Public Counsel") Fourth Request for Production of Documents dated May 23, 1991, and (2) pursuant to Rule 25-22.006(5)(c), its Motion for a Temporary Protective Order for certain information contained in documents to be produced or otherwise made available to Public Counsel. To the extent that any response might otherwise be a subject of a motion for a protective order, this response may be considered as serving that purpose. See, Slatnick v. Leadership Housing System of Florida, Inc. 368 So.2d 78 (Fla. 4th DCA 1979).

GENERAL RESPONSE AND OBJECTIONS

1. Southern Bell does not believe it was Public Counsel's intent to require Southern Bell to produce again the same documents previously produced in other dockets, but to the extent it does, Southern Bell objects on the basis that such a request would be unduly burdensome, oppressive and unnecessary, and for these reasons is prohibited.

DOCUMENT NUMBER-DATE

06329 JUN 24 1991

PSC-RECORDS/REPORTING

2. Southern Bell objects to the specific time and place designated by Public Counsel for the production of documents for the reasons that the designation is not reasonable, but has no objection to producing the documents which are responsive and to which no other objection is made, at a mutually agreed upon time and place.

3. Some of the documents that will be delivered to or reviewed by Public Counsel contain proprietary, confidential business information which should not be publicly disclosed. Thus, pursuant to the Commission's rule on confidentiality, Rule 25-22.006(5)(c), Florida Administrative Code, Southern Bell moves the Prehearing Officer to issue a Temporary Protective Order exempting these documents and information from Section 119.07(1), Florida Statutes. The documents in question are various forms of network reviews which are the equivalent of internal audits, which are exempt from disclosure under section 364.183, Florida Statutes. In addition, a number of the proprietary documents in question contain customer specific information which is exempt from disclosure pursuant to Section 119.07(3)(w), Florida Statutes. Once Public Counsel notifies Southern Bell that any documents containing proprietary materials are to be used in a proceeding before the Commission, Southern Bell will file a detailed Motion for Protective Order specifically addressing each of the documents identified in accordance with Rule 25-22.006, Florida Administrative Code.

SPECIFIC RESPONSES


5. Subject to the general responses and objections, each of which is incorporated by reference into the specific responses made herein, Southern Bell responds to the individual numbered requests contained in Public Counsel's Third Request for Production of Documents as follows:

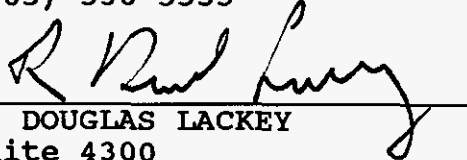
A. In response to Request No. 1, Southern Bell will produce, at a mutually convenient time and place, the responsive materials it has in its possession, custody or control.

B. In response to Request No. 2, Southern Bell is not familiar with documents denominated as "staff review of trouble reports", but believes that any such reports would be encompassed within the documents previously produced and the documents produced in response to Request No. 1.

Respectfully submitted this 24th day of June, 1991.

SOUTHERN BELL TELEPHONE AND
TELEGRAPH COMPANY


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