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Southern Bell Telephone
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150 South Monroe Street
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August 31, 1992

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

RE: Docket No. 910163-TL

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Response and Objections to Staff's Eighteenth Request for Production of Documents and Notice of Intent to Request Confidential Classification which we ask that you file 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 to the parties shown on the attached Certificate of Service.


Sincerely,


Sidney J. White, Jr.

Enclosures

cc: All Parties of Record
A. M. Lombardo
H. R. Anthony
R. D. Lackey

RECEIVED & FILED


FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 910163-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 31st day of August, 1992 to:

Charles J. Beck
Assistant Public Counsel
Office of the Public Counsel
Room 812
111 W. Madison Street
Tallahassee, FL 32399-1400

Tracy Hatch
Division of Legal Services
Florida Public Svc. Commission
101 East Gaines Street
Tallahassee, FL 32399-0863

A handwritten signature in cursive script, appearing to read "Tracy Hatch", written over a horizontal line. The signature is fluid and stylized, with a prominent loop at the end.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition on Behalf of)	
Citizens of the State of Florida)	Docket No. 910163-TL
to Initiate Investigation into)	
Integrity of Southern Bell)	Filed: August 31, 1992
Telephone and Telegraph Company's)	
Repair Service Activities and)	
Reports.)	
)	

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
 RESPONSE AND OBJECTIONS TO STAFF'S
 EIGHTEENTH REQUEST FOR PRODUCTION OF DOCUMENTS
AND NOTICE OF INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION

COMES NOW BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), and files, pursuant to Rule 25-22.034, Florida Administrative Code, and Rule 25-22.006(3)(a), 1) its Responses and Objections to the Office of Staff's Eighteenth Request for Production of Documents dated July 27, 1992 and 2) its Notice of Intent to Request Confidential Classification.

NOTICE OF INTENT TO REQUEST
SPECIFIED CONFIDENTIAL CLASSIFICATION

Some of the documents that will be produced for the Staff in response to its Eighteenth Request for Production of Documents contain information which is exempted from public disclosure pursuant to §§ 119.07 and 364.183, Florida Statutes. Specifically, some of the documents contain employee-specific information unrelated to compensation, expressly included as proprietary confidential business information under § 364.183(3)(f), Florida Statutes. Because these documents contain exempt information, Southern Bell is filing this Notice of Intent to Request Confidential Classification, pursuant to

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Rule 25-22.006(3)(a), Florida Administrative Code, in order to allow the Staff to review these documents without delay. The original of this Notice has been filed with the Division of Records and Reporting, and a copy has been served on the division requesting the information.

GENERAL RESPONSE AND OBJECTIONS

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

2. Southern Bell objects to Staff's definition of "document" or "documents". Staff's definition of these terms is overly broad and is objectionable pursuant to standards adopted in *Caribbean Security Systems v. Security Control Systems, Inc.*, 46 So.2d 654 (Fla. App. 3rd Dist. 1986).

SPECIFIC RESPONSES

4. In response to Request No. 1, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.


5. In response to Request No. 2, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.


6. In response to Request No. 3, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

7. In response to Request No. 4, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place subject to its Notice of Intent to Request Specified Confidential Classification set forth above. These documents contain employee-specific information unrelated to compensation.

Respectfully submitted this 31st day of August, 1992.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY


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