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January 14, 1993

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

RE: Docket No. 920260-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 Fifteenth Request for Production of Documents and Notice of Intent to Request Confidential Classification. Please file this document 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.

APR 3  
APR  
CIT  
CIT

Sincerely,

*Nancy B. White*  
Nancy B. White (22)

Enclosures

cc: 1 All Parties of Record

6 A. M. Lombardo  
H. R. Anthony  
R. D. Lackey

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*Ray*  
*[Signature]*

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**CERTIFICATE OF SERVICE**  
**Docket No. 920260-TL**

I HEREBY CERTIFY that a copy of the foregoing has been furnished  
by United States Mail this 14th day of January, 1993 to:

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*Nancy B. White*  

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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: January 14, 1993  
Company (Formerly FPSC Docket )  
Number 880069-TL) )  
\_\_\_\_\_)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
RESPONSE AND OBJECTIONS TO STAFF'S  
FIFTEENTH 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 (1) pursuant to Rule 25-22.034, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, its Response and Objections to the Florida Public Service Commission Staff's ("Staff") Fifteenth Request for Production of Documents dated January 5, 1993 and (2) pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, its Notice of Intent to Request Confidential Classification.

NOTICE OF INTENT TO REQUEST 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, among other things, employee specific information and information on the unregulated operations of BellSouth Corporation, and other proprietary confidential business information. This information is included as proprietary confidential business information under § 364.183, Florida Statutes and Rule 25-22.006, Florida Administrative Code.

Because these documents contain exempt information, Southern Bell

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

is filing this Notice of Intent to Request Confidential Classification, pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, in order to allow the Staff access to 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 this information.

#### GENERAL RESPONSE AND OBJECTIONS

1. 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., 486 So. 2d 654 (Fla. App. 3rd District 1986).

2. 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 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.

3. The following Specific Responses are given subject to the above-stated General Responses and Objections.

#### SPECIFIC RESPONSES

4. In response to Request No. 131, 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. 132, 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. 133, refer to Southern Bell's response to FPSC Staff's First Request for Documents, Item 14.

7. In response to Request No. 134, Southern will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

8. In response to Request No. 135, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

9. In response to Request No. 136, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

10. In response to Request No. 137, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

11. In response to Request No. 138, Southern Bell did not furnish any documents in response to Item 161 of the Office of Public Counsel's Thirteenth Production of Documents.

12. In response to Request No. 139, Southern Bell objects to portions of this request on the grounds that it contains proprietary and confidential business information concerning employee specific information and information on the unregulated operations of BellSouth Corporation. Southern will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place, subject to the Notice of Intent filed herein.

13. In response to Request No. 140, Southern Bell will

produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

14. In response to Request No. 141, Southern Bell has no documents responsive to this request.

15. In response to Request No. 142, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

16. In response to Request No. 143, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

17. In response to Request No. 144, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

18. In response to Request No. 145, Southern Bell has no documents responsive to this request.

19. In response to Request No. 146, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

20. In response to Request No. 147, Southern Bell has no documents responsive to this request.

21. In response to Request No. 148, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place. Also refer to Southern Bell's response to Item 151.

22. In response to Request No. 149, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

23. In response to Request No. 150, Southern Bell has no documents responsive to this request.

24. In response to Request No. 151, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place. Also refer to Southern Bell's response to Item 148.

25. In response to Request No. 152, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

26. In response to Request No. 153, Southern Bell has no responsive documents to this request. Also refer to Southern Bell's response to Public Counsel's Twelfth Interrogatories Item No. 231.

27. In response to Request No. 154, Southern Bell has no responsive documents to this request. Also refer to Southern Bell's response to Public Counsel's Twelfth Interrogatories Item No. 231.

28. In response to Request No. 155, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

29. In response to Request No. 156, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

30. In response to Request No. 157, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place. Also refer to Southern Bell's response to Item 155.



31. In response to Request No. 158, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

32. In response to Request No. 159, Southern Bell objects to this request. The documents requested do not exist. Southern Bell further objects to this request on the ground that it is burdensome and oppressive. The MFR schedules produced in this docket required months to develop and the expenditure of many manhours. The employees required to do this work are still employed making FPSC Staff requested changes to the MFR schedules produced for the test year.

Respectfully submitted this 14th day of January, 1993.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY



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