NANCY B. WHITE General Attorney

Southern Bell Telephone and Telegraph Company Suite 400 150 South Monroe Street Tallahassee, Florida 32301 (404) 529-5387

March 9, 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, 900960-TL, 910163-TL, 910727-TL

Dear Mr. Tribble:

Enclosed is an original and fifteen copies of a Southern Bell Telephone and Telegraph Company's Response and Objections to Staff's Nineteenth Request for Production of Documents. Please file this document in the above-captioned dockets.

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.

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ACK AFA	Sincerely,
APP	7/ and Jur
CAF	Mancy B. White
Enclo	osures
LEG I W/m	All Parties of Record A. M. Lombardo
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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 9th day of March, 1993 to:

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Florida Public Service
Commission
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Tallahassee, FL 32399-0866

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## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of the Revenue Requirements and Rate Stabilization Plan of Southern Bell Telephone and Telegraph Company Docket No. 920260-TL

In re: Show cause proceeding against Southern Bell Telephone and Telegraph Company for misbilling customers

Docket No. 900960-TL

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

In re: Investigation into Southern Bell Telephone and Telegraph Company's compliance with Rule 25-4.110(2), F.A.C., Rebates Docket No. 910727-TL

Filed: March 9, 1993

## SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S RESPONSE AND OBJECTIONS TO STAFF'S NINETEENTH REQUEST FOR PRODUCTION OF DOCUMENTS

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 1.350 of the Florida Rules of Civil Procedure, its Responses and Objections to the Staff of the Florida Public Service Commission's ("Staff"), Nineteenth Request for Production of Documents dated February 2, 1993.

## SPECIFIC RESPONSES

1. With respect to Request No. 206, Southern Bell will produce responsive documents it has in its possession, custody, or control at a mutually convenient time and place.

Respectfully submitted this 9th day of March, 1993.

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

HARRIS R. ANTHONY (QL)

c/o Marshall M. Criser, TII 400 - 150 South Monroe Street Tallahassee, Florida 32301

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