

Legal Department

MARY JO PSEB
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March 21, 1994

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

Re: Docket No. 921074-11

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of BellSouth Telecommunications, Inc.'s d/b/a Southern Bell Telephones and Telegraph Company's Objections and Responses to Staff's First Request for Production of Documents, and Southern Bell's First Notice of Intent to Request Confidential Classification, to be filed for the Commission's consideration. Service is being provided in accordance with 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. Thank you for your assistance in this matter.

Sincerely,

Mary Jo Pseb

RECEIVED & FILED

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EPSC-BUREAU OF RECORDS

Enclosures

cc: H. R. Anthony
A. M. Lombardo
R. Douglas Lackey

All Parties noted on Certificate of Service

Request Confidential
DOCUMENT NUMBER-DATE

02662 MAR 21 94

FPSC-RECORDS/REPORTING

object & response
Staff First Req
DOCUMENT NUMBER-DATE

02661 MAR 21 94

FPSC-RECORDS/REPORTING

BEFORE
THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL
FILE COPY

In re: Expanded Interconnection)	DOCKET NO. 921074-TP
Phase II and Local Transport)	DOCKET NO. 930955-TL
Restructure)	DOCKET NO. 940014-TL
<hr/>		DOCKET NO. 940020-TL
)	DOCKET NO. 931196-TL
)	DOCKET NO. 940190-TL

SOUTHERN BELL TELEPHONE AND TELEGRAPH
COMPANY'S OBJECTIONS AND RESPONSES TO STAFF'S
FIRST 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, Florida Rules of Civil Procedures, its Objections and Responses to Florida Public Service Commission Staff's ("Staff") First Request for Production of Documents dated February 14, 1994.

General Responses and Objections

1. Southern Bell objects to Staff's definition of "document" or "documents". Staff's definition of these is overly broad and objectionable pursuant to the standards adopted in Caribbean Security Systems v. Security Control Systems, Inc., 486 S.2d 654(Fla. App. 3rd. Dist. 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 documents, 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

02661 MAR 21 1994

FPSC-RECORDS/REPORTING

3. The following specific responses are subjected to the above-stated general responses and objections.

Specific Responses

4. In response to Request No. 1, Southern Bell will produce the responsive documents to Request No. 1.

5. In response to Request No. 2, Southern Bell will produce the summary documents for the cost studies responsive to Request No. 2.

6. In response to Request No. 3, Southern Bell will produce the summary documents for the cost studies responsive to Request No. 3.

7. In response to Request No. 4, Southern Bell will produce the summary documents for the cost studies responsive to Request No. 4.

8. In response to Request No. 5, Southern Bell objects to portions of this request on the grounds that the documents requested contain proprietary confidential business information concerning contractual data, information with commercially valuable to Southern Bell and other proprietary confidential business information. Southern Bell will produce the responsive documents in its possession, custody or control at mutually convenient time and place, subject to Southern Bell's First Notice of Intent to Request Confidential Treatment filed March 21, 1994, in this docket.

9. In response to Request No. 6, Southern Bell will produce the summary documents for the cost studies responsive to Request No. 6.

10. In response to Request No. 7, Southern Bell will produce the summary documents for the cost studies responsive to Request No. 7.

11. In response to Request No. 8, Southern Bell will produce the summary documents for the cost studies responsive to Request No. 8.

12. In response to Request No. 9, all documents responsive to this request are found within Tariff Filing Package T-92-033, Florida docket No. 920117-TL.

13. In response to Request No. 10, Southern Bell objects to portions of this request on the grounds that the documents requested contain proprietary confidential business information concerning contractual data, information with commercially valuable to Southern Bell and other proprietary confidential business information. Southern Bell will produce the responsive documents in its possession, custody or control at mutually convenient time and place, subject to Southern Bell's First Notice of Intent to Request Confidential Treatment filed March 21, 1994, in this docket.

14. In response to Request No. 11, Southern Bell will produce documents responsive to this request.

15. In response to Request No. 12, Southern Bell will produce the responsive documents to this request.

16. In response to Request No. 13, Southern Bell will produce the responsive documents to this request.

17. In response to Request No. 14, Southern Bell will produce the responsive documents to this request.

18. In response to Request No. 15, Southern Bell will produce the responsive documents to this request.

19. In response to Request No. 16, Southern Bell will produce the responsive documents to this request.

Respectfully submitted this 21st day of March, 1994.

ATTORNEYS FOR
BELL SOUTH TELECOMMUNICATIONS, INC.
d/b/a SOUTHERN BELL TELEPHONE AND
TELEGRAPH COMPANY

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*in/pam
2/21/94*

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