

4:35

MARY JO PEED
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**ORIGINAL
FILE COPY**

August 15, 1994

Mrs. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

Re: Docket No. ~~921074-11~~

Dear Mrs. Bayo:

Enclosed please find an original and fifteen copies of BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company's Response and Objections to IAC's Fourth Request for Production of Documents ("Southern Bell's Response"), and Southern Bell's Fifth Notice of Intent to Request Confidential Classification ("Southern Bell's Fifth Notice"). Also included is Southern Bell's Late Filed Deposition Exhibits of Jerry Hendrix and David Denton to be filed in the above mentioned docket. *Hand-delivered to LEG/Cangano*

- ACK
- AFA _____
- APP _____
- C/F _____
- Bill*
- CTR _____
- ENG _____
- LEG *Cangano*
- LIT *H*
- OPD _____
- ROH _____
- SEC *L*
- WAS _____
- OTH _____

A copy of this letter is enclosed. Please indicate on the copy that the original was filed and return the copy to me. Copies of Southern Bell's Response and Fifth Notice have been served on the parties shown on the attached Certificate of service. Because of the volume of paper included in the Late

Req. for Prod
Exhibit log
DOCUMENT NUMBER-DATE
08333 AUG 16 8
FPSC-RECORDS/REPORTING

to KS w/confidential
Not. Intent to Reg
DOCUMENT NUMBER-DATE
08334 AUG 16 8
FPSC-RECORDS/REPORTING

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filed exhibits of Mr. Hendrix and Mr. Denton, Southern Bell is not serving the parties with a copy of the late filed exhibits but will provide a copy upon request.

Sincerely,

Mary Jo Peed (oj)

Mary Jo Peed

Enclosures

cc: Robert G. Beatty
A. M. Lombardo
R. Douglas Lackey
All Parties noted on Certificate of Service

ORIGINAL
FILE COPY

BEFORE
THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Expanded Interconnection) DOCKET NO. 921074-TP
Phase II and Local Transport)
Restructure)
_____) August 15, 1994

BELLSOUTH TELECOMMUNICATIONS, INC.'S D/B/A
SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
RESPONSES AND OBJECTIONS TO IAC'S FOURTH
REQUEST FOR PRODUCTION OF DOCUMENTS

COMES NOW, BellSouth Telecommunications, Inc., doing business as Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company") and files pursuant to Rules 25-22.04, Florida Administrative Code and Rule 1.350, Florida Rules of Civil Procedure, its Objections and Responses to Interexchange Access Coalition's ("IAC") Fourth Request for Production of Documents.

GENERAL RESPONSE AND OBJECTIONS

1. Southern Bell objects to IAC's definition of "document" or "documents". IAC's definition 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 IAC's intent to require Southern Bell to produce again the same documents previously produced in other requests, 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
08333 AUG 16 8
FPSC-RECORDS/REPORTING

SPECIFIC RESPONSES

3. Subject to the general objections, which are incorporated by reference into the specific response made herein, Southern Bell responds to the individual numbered request contained in IAC's Fourth Request for Production of Documents as follows:

A. In response to Request No. 1, Southern Bell objects to this request on the grounds that some of the documents responsive to this request contain proprietary confidential business information. Southern Bell will produce the documents pursuant to the protective agreement which has been executed between the parties at a mutually agreeable time and location.

Respectfully submitted this 15th day of August, 1994.

BELLSOUTH TELECOMMUNICATIONS, INC.
d/b/a SOUTHERN BELL TELEPHONE AND
TELEGRAPH COMPANY

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CERTIFICATE OF SERVICE
Dockets No. 921074-TL, 930955-TL,
940014-TL, 940020-TL, 931196-TL, 940190-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this *15* day of *August* 1994,
to:

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