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August 23, 1996

Mrs. Blanca S. Bayo  
Director, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399

RE: Docket No. 920260-TL

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response and Objections to AT&T Communications of the Southern States, Inc.'s First Request for Production of Documents and Motion for Protective Order. Please file these documents in the 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.

Sincerely,

*Nancy B. White (PW)*  
Nancy B. White

ACK ✓  
 AFA 1 Enclosures  
 APP cc: All Parties of Record  
 CAF A. M. Lombardo  
 CMU Norton R. G. Beatty  
W. J. Ellenberg  
 CTR \_\_\_\_\_  
 EAG \_\_\_\_\_  
 LEG 1  
 LIN 5  
 OPC \_\_\_\_\_  
 RCH \_\_\_\_\_  
 SEC 1  
 WAS \_\_\_\_\_  
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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 23rd day of August, 1996 to:

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Nancy B. White (M)

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: August 23, 1996  
Company )  
\_\_\_\_\_ )

BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSE AND OBJECTIONS TO  
AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.'S  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS  
AND MOTION FOR PROTECTIVE ORDER

COMES NOW BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), and files, (1) pursuant to Rule 25-22.034, Florida Administrative Code, and Rules 1.280(c) and 1.350 of the Florida Rules of Civil Procedure, its Responses and Objections to AT&T Communications of the Southern States, Inc.'s ("AT&T") First Request for Production of Documents dated July 24, 1996, and (2) Motion for Protective Order.

GENERAL OBJECTIONS

1. BellSouth objects to the requests to the extent that such requests seek to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such requests are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. BellSouth has interpreted AT&T's requests to apply to BellSouth's regulated intrastate operations in Florida and will limit its Answers accordingly. To the extent that any request is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the Commission,

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REGULATORY REPORTING

BellSouth objects to such request as irrelevant, overly broad, unduly burdensome, and oppressive.

3. BellSouth objects to each and every request and instruction to the extent that such request or instruction calls for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. BellSouth objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

5. BellSouth objects to each and every request to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that AT&T's requests request proprietary confidential business information which is not subject to the "trade secrets" privilege, BellSouth will make such information available to counsel for AT&T pursuant to an appropriate Protective Agreement, subject to any other general or specific objections.

#### SPECIFIC RESPONSES

6. With respect to Request No. 1, BellSouth objects to producing the documents requested on the basis that the documents responsive to this request contain proprietary and confidential business information regarding BellSouth's revenues specific to each route. Consequently, BellSouth moves for a Protective Order as set forth herein. In the alternative, the production of such

documents should occur only after the execution of an acceptable protective agreement.

Respectfully submitted this 23rd day of August, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.

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