

R. Douglas Lackey
General Attorney
Legal Department

**ORIGINAL
FILE COPY**

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Tallahassee, Florida 32301
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August 21, 1991

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

RE: Docket No. 910163-TL

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Response and Objections to Public Counsel's Eighth Request for Production of Documents which we ask that you file 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 to the parties shown on the attached Certificate of Service.

ACK _____
AFA _____
APP _____
CAF _____
CMU _____
CTR Enclosures

Sincerely yours,


R. Douglas Lackey

EAG cc: ~~All Parties of Record~~

LEG AW/A A. M. Lombardo
H. R. Anthony

LIN 6

GPC _____

RCH _____

SEC 1

WAS _____

OTH _____

RECEIVED & FILED


FPSC-BUREAU OF RECORDS

A BELL SOUTH Company

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 910163-TL

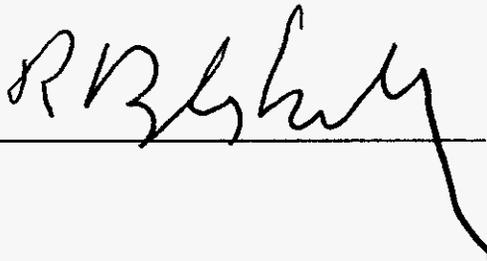
I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 21st day of August, 1991.

to:

Charles J. Beck
Assistant Public Counsel
Office of the Public Counsel
111 W. Madison Street
Room 812
Tallahassee, Florida 32399-1400

Robert Vandiver
Division of Legal Services
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0863

Tracy Hatch
Division of Legal Services
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0863



In re: Investigation into the)	
Integrity of Southern Bell's)	Docket No. 910163-TL
Repair Service Activities)	Filed: August 21, 1991
and Reports)	
)	

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
RESPONSE AND OBJECTIONS TO PUBLIC COUNSEL'S
EIGHTH REQUEST FOR PRODUCTION OF DOCUMENTS

COMES NOW Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company") and files, 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 Response and Objections to the Office of Public Counsel's ("Public Counsel") Eighth Request for Production of Documents dated July 17, 1991. To the extent that any individual request might otherwise be the subject of a motion for a protective order other than pursuant to Rule 25-22.006(5)(c), this response may be considered as serving that purpose. See, Slatnick v. Leadership Housing System of Florida, Inc. 368 So.2d 78 (Fla. 4th DCA 1979).

GENERAL RESPONSE AND OBJECTIONS

1. Southern Bell does not believe it was Public Counsel's intent to require Southern Bell to produce the same documents previously or contemporaneously 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.

2. Southern Bell objects to the time and place designated by Public Counsel on the basis that they are unreasonable, but

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will produce the responsive documents it has identified at a mutually agreeable time and place.

SPECIFIC RESPONSES

3. Subject to the general objections, each of which is incorporated by reference into the specific responses made herein, Southern Bell responds to the individual numbered requests contained in Public Counsel's Eighth Request for Production of Documents as follows:

A. In response to Request No. 1, Southern Bell states that it does not have in its possession, custody or control any documents responsive to Request No. 1. By way of further explanation, Southern Bell will provide copies of the appropriate BellSouth Practices and other documents which show that the "stop the clock" procedure is not authorized in Southern Bell.

B. In response to Request No. 2, Southern Bell states that it does not have in its possession, custody or control any documents responsive to Request No. 2. By way of further explanation, Southern Bell will provide copies of the appropriate BellSouth Practices and other documents which show that there is no authorized procedure for "backing up" the time.

C. In response to Request No. 3, Southern Bell states that it does not have in its possession, custody or control any documents responsive to Request No. 3. By way of further explanation, see Response to Request No. 2 above.

Respectfully submitted this 21st day of August, 1991.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY

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