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STATE OF FLORIDA
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature
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January 5, 1993

Steve Tribble, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0850

Re: Docket No. 920260-TL

Dear Mr. Tribble:

Enclosed for filing in the above-referenced docket on behalf of the Citizens of the State of Florida are the original and 15 copies of the Citizens' Motion to Require Responses to Interrogatories and Production of Documents by January 14, 1993.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Sincerely,

Charles J. Beck
Charles J. Beck
Deputy Public Counsel

- ACK
- AFA 1
- APD _____
- CAF _____
- CIC _____
- CTA _____
- EAB _____
- LEA 1/12/93
- LIR 6
- OFC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

Enclosure

DOCUMENT NUMBER-DATE

00094 JAN-58

FPSC-RECORDS/REPORTING

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ENCLOSURE

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Comprehensive Review of the)
Revenue Requirements and Rate) Docket No. 920260-TL
Stabilization Plan of Southern) Filed: January 5, 1993
Bell Telephone & Telegraph Company)
_____)

MOTION TO REQUIRE RESPONSES TO INTERROGATORIES AND PRODUCTION OF DOCUMENTS BY JANUARY 14, 1993

The Citizens of Florida ("Citizens"), by and through Jack Shreve, Public Counsel, request the Commission to order BellSouth Telecommunications, Inc., to produce the documents responsive to the Citizens' twenty-fifth request for production of documents and nineteenth set of interrogatories by January 14, 1993.

1. Southern Bell filed rebuttal testimony late in the day on Friday, December 18, 1992.

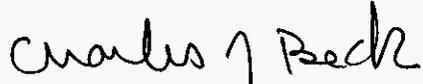
2. The Citizens' twenty-fifth request for production of documents consists of four requests for documents raised by the rebuttal testimony of Dr. Taylor, and the Citizens' nineteenth set of interrogatories consists of four such interrogatories. The documents requested should be easy to locate without a burdensome search, and the interrogatories require only straight forward responses.

3. The documents and interrogatory responses are needed by no later than Thursday, January 14, 1993 in order to prepare the case in a timely manner.

WHEREFORE, the Citizens the Commission to order BellSouth Telecommunications, Inc., to produce the documents responsive to the Citizens' twenty-fifth request for production of documents and responses to the Citizens' nineteenth set of interrogatories by January 14, 1993.

Respectfully submitted,

Jack Shreve
Public Counsel


Charles J. Beck
Deputy Public Counsel

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Attorneys for the Citizens of
the State of Florida

**CERTIFICATE OF SERVICE
DOCKET NO. 920260-TL**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail or hand-delivery to the following parties on this 5th day of January, 1993.

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& Telegraph Company)
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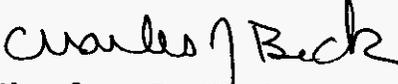
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Deputy Public Counsel

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Public Counsel



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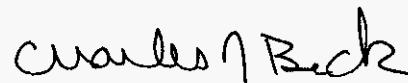
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