

NANCY B. WHITE
General Attorney

Southern Bell Telephone
and Telegraph Company
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(404) 529-5387

ORIGINAL
FILE COPY

October 4, 1993

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

RE: Docket No. 920260-TL

Dear Mr. Tribble:

Enclosed is an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Response and Objections to American Telephone and Telegraph Company's First Request for Production of Documents and Motion for Protective Order. Please file these documents in the above-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. 2 Copies have been served on the parties shown on the attached certificate of service.

- ACK _____
- ADM 2 _____
- APP 1 _____
- CIF _____
- CMS _____
- CTF _____
- ESP _____
- LET 1 Enclosures
- LIJ 6 cc: All Parties of Record
- OPR _____
- RCH _____
- SEC 1 _____
- WAS _____
- OTH KS _____

Sincerely,
Nancy B. White
Nancy B. White

RECEIVED
KS

DOCUMENT NUMBER-DATE
10661 OCT-4 8
FPC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

0212-11
FILE 11/17

In re: Comprehensive Review of)
the Revenue Requirements and Rate) Docket No. 920260-TL
Stabilization Plan of Southern)
Bell Telephone and Telegraph) Filed: October 4, 1993
Company (Formerly FPSC Docket)
Number 880069-TL))
_____)

SOUTHERN BELL'S RESPONSE AND OBJECTIONS TO
AMERICAN TELEPHONE AND TELEGRAPH COMPANY'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND
MOTION FOR PROTECTIVE ORDER

COMES NOW BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" 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 the American Telephone and Telegraph Company ("AT&T") First Request for Production of Documents dated September 3, 1993, and (2) Motion for Protective Order.

GENERAL RESPONSE AND OBJECTIONS

1. Southern Bell objects to producing some of the documents requested by AT&T on the basis that the documents sought contain proprietary and confidential business information regarding, among other things, competitively sensitive information, and information regarding competitive services provided by Southern Bell. Consequently, Southern Bell moves the Prehearing Officer to issue a Protective Order directing that discovery not be had with respect to the proprietary and confidential business documents referenced more specifically herein, or that discovery only be had under certain conditions.

DOCUMENT NUMBER-DATE

10661 OCT-4 8

FILE RECORDS/REPORTING

Southern Bell would be willing to entertain negotiations regarding producing certain of these documents to the attorneys representing AT&T upon the execution of an appropriate protective agreement.

SPECIFIC RESPONSES

2. In response to Request No. 1, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place. The study referred to in Request No. 1 is not in Southern Bell's possession, custody or control.

3. In response to Request No. 2, Southern Bell objects to this request on the basis that some of the responsive documents contain proprietary and confidential business information related to, among other things, projected market and cost information, as well as general analysis relating to intrastate interexchange access service. Consequently, Southern Bell moves for a Protective Order as set forth herein directing that discovery not be had as to the documents requested in this Item, or that any production of such documents occur only after the execution of an acceptable protective agreement.

4. In response to Request No. 3, Southern Bell refers AT&T to Request No. 2.

5. In response to Request No. 4, Southern Bell objects to this request on the basis that some of the responsive documents contain proprietary and confidential business information related to, among other things, projected market and cost information, as

well as general analysis relating to competitive services. Consequently, Southern Bell moves for a Protective Order as set forth herein directing that discovery not be had as to the documents requested in this Item, or that any production of such documents occur only after the execution of an acceptable protective agreement.

6. In response to Request No. 5, Southern Bell objects to this request on the basis that some of the responsive documents contain proprietary and confidential business information related to, among other things, projected market and cost information, as well as general analysis relating to intrastate switched access service. Consequently, Southern Bell moves for a Protective Order as set forth herein directing that discovery not be had as to the documents requested in this Item, or that any production of such documents occur only after the execution of an acceptable protective agreement.

7. In response to Request No. 6, Southern Bell objects to this request on the basis that some of the responsive documents contain proprietary and confidential business information related to, among other things, projected market and cost information, as well as general analysis relating to local exchange service. Consequently, Southern Bell moves for a Protective Order as set forth herein directing that discovery not be had as to the documents requested in this Item, or that any production of such documents occur only after the execution of an acceptable protective agreement.

8. In response to Request No. 7, Southern Bell has no responsive documents in its possession, custody, or control.

Respectfully submitted this 4th day of October, 1993.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY

Harris R Anthony

HARRIS R. ANTHONY
PHILLIP J. CARVER
c/o Marshall M. Criser
Suite 400
150 South Monroe Street
Tallahassee, Florida 32301
(305) 530-5555

R Douglas Lackey

R. DOUGLAS LACKEY
NANCY B. WHITE
4300 Southern Bell Center
675 West Peachtree St., N.E.
Atlanta, Georgia 30375
(404) 529-5387

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 4th day of October, 1993 to:

Robin Norton
Division of Communications
Florida Public Service
Commission
101 East Gaines Street
Tallahassee, FL 32399-0866

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

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

Michael J. Henry
MCI Telecommunications Corp.
MCI Center
Three Ravinia Drive
Atlanta, Georgia 30346-2102

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Grandoff & Reeves
315 South Calhoun Street
Suite 716
Tallahassee, FL 32301-1838
atty for FIXCA

Richard D. Melson
Hopping Boyd Green & Sams
Post Office Box 6526
Tallahassee, Florida 32314
atty for MCI

Patrick K. Wiggins
Wiggins & Villacorta, P.A.
Post Office Drawer 1657
Tallahassee, Florida 32302
atty for Intermedia and Cox

Rick Wright
Regulatory Analyst
Division of Audit and Finance
Florida Public Svc. Commission
101 East Gaines Street
Tallahassee, FL 32399-0865

Kenneth A. Hoffman
Messer, Vickers, Caparello,
Madsen, Lewis & Metz, PA
Post Office Box 1876
Tallahassee, FL 32302
atty for FPTA

Laura L. Wilson, Esq.
c/o Florida Cable Television
Association, Inc.
Post Office Box 10383
310 North Monroe Street
Tallahassee, FL 32302
atty for FCTA

Chanthina R. Bryant
Sprint Communications Co.
Limited Partnership
3065 Cumberland Circle
Atlanta, GA 30339

Michael W. Tye
AT&T Communications of the
Southern States, Inc.
106 East College Avenue
Suite 1410
Tallahassee, Florida 32301

Dan B. Hendrickson
Post Office Box 1201
Tallahassee, FL 32302
atty for FCAN

Benjamin H. Dickens, Jr.
Blooston, Mordkofsky,
Jackson & Dickens
2120 L Street, N.W.
Washington, DC 20037
Atty for Fla Ad Hoc

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs, Odom
& Ervin
305 South Gadsen Street
Post Office Drawer 1170
Tallahassee, Florida 32302
atty for Sprint

Florida Pay Telephone
Association, Inc.
c/o Mr. Lance C. Norris
President
Suite 202
8130 Baymeadows Circle, West
Jacksonville, FL 32256

Monte Belote
Florida Consumer Action Network
4100 W. Kennedy Blvd., #128
Tampa, FL 33609

Donald L. Bell, Esq.
104 East Third Avenue
Tallahassee, FL 32303
Atty for AARP

Gerald B. Curington
Department of Legal Affairs
Room 1603, The Capitol
Tallahassee, FL 32399-1050

Mr. Douglas S. Metcalf
Communications Consultants,
Inc.
631 S. Orlando Ave., Suite 250
P. O. Box 1148
Winter Park, FL 32790-1148

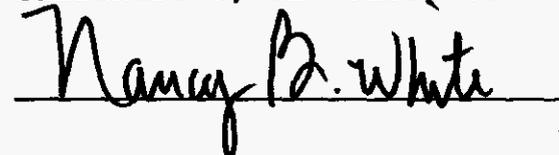
Mr. Cecil O. Simpson, Jr.
General Attorney
Mr. Peter Q. Nyce, Jr.
General Attorney
Regulatory Law Office
Office of the Judge
Advocate General
Department of the Army
901 North Stuart Street
Arlington, VA 22203-1837

Mr. Michael Fannon
Cellular One
2735 Capital Circle, NE
Tallahassee, FL 32308

Floyd R. Self, Esq.
Messer, Vickers, Caparello,
Madsen, Lewis, Goldman & Metz
Post Office Box 1876
Tallahassee, FL 32302-1876
Attys for McCaw Cellular

Angela Green
Division of Legal Services
Florida Public Svc. Commission
101 East Gaines Street
Tallahassee, FL 32399-0863

Stan Greer
Division of Communications
Florida Public Svc. Commission
101 East Gaines Street
Tallahassee, FL 32399-0863


Nancy B. White