

ORIGINAL  
FILE COPY

NANCY B. WHITE  
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December 6, 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 are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Response and Objections to Florida Interexchange Carrier Association's Third Request for Production of Documents. 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* /AS  
Nancy B. White

- ACK
- AFA 2
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 1 w/memo
- LIN 6
- CPC \_\_\_\_\_
- POH \_\_\_\_\_
- SEC 1
- WAS \_\_\_\_\_
- DTH \_\_\_\_\_

Enclosures

cc: All Parties of Record  
A. M. Lombardo  
H. R. Anthony  
R. D. Lackey

RECEIVED & FILED  
*[Signature]*  
FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE  
12990 DEC-6 83  
FPSC-RECORDS/REPORTING

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: December 6, 1993  
Company )  
\_\_\_\_\_ )

SOUTHERN BELL'S RESPONSE AND OBJECTIONS TO  
FLORIDA INTEREXCHANGE CARRIER ASSOCIATION'S  
THIRD REQUEST FOR PRODUCTION OF DOCUMENTS

COMES NOW BellSouth Telecommunications, Inc. d/b/a 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 Responses and Objections to the Florida Interexchange Carrier Association's ("FIXCA") Third Request for Production of Documents dated November 5, 1993.

GENERAL RESPONSE AND OBJECTIONS

1. Southern Bell objects to FIXCA's definition of "document" or "documents". Public Counsel's definition of these terms is overly broad and is objectionable pursuant to standards adopted in Caribbean Security Systems v. Security Control Systems, Inc., 486 So.2d 654 (Fla. App. 3rd District 1986).

2. Southern Bell objects to FIXCA's instruction relating to the details of privileged documents. To the extent production is objected to due to the privileged nature of documents, the information suggested by FIXCA would similarly be privileged and is therefore prohibited.

3. Southern Bell objects to the instruction as to information that is to be provided for any document not in the possession of Southern Bell. This request for an extensive

narrative as to the "disposition" of these documents is not properly encompassed with a Request for Production, and is, further, unreasonable and burdensome.

SPECIFIC RESPONSES

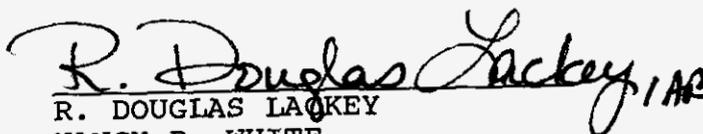
4. In response to Request No. 14, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

Respectfully submitted this 6th day of December, 1993.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY



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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 6th day of December, 1993 to:

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