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ORIGINAL  
FILE COPY

December 13, 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 Staff's Thirtieth 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.

- ACK
- AFA 2
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU
- CTR \_\_\_\_\_
- ENC \_\_\_\_\_
- LTS 1
- LOJ 6
- MSJ \_\_\_\_\_
- RCJ \_\_\_\_\_
- SCJ 1
- WAS \_\_\_\_\_
- JTH \_\_\_\_\_

Sincerely,

*Nancy B. White (NW)*  
Nancy B. White

Enclosures

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

RECEIVED & FILED

*MS*  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

13291 DEC 13 88

FPSC-RECORDS/REPORTING

the Revenue Requirements and Rate )  
Stabilization Plan of Southern )  
Bell Telephone and Telegraph )  
Company )  
\_\_\_\_\_ )

Docket No. 920260-TL  
Filed: December 13, 1993

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
RESPONSE AND OBJECTIONS TO STAFF'S  
THIRTIETH 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 Rule 25-22.006(3)(a), 1) its Responses and Objections to the Staff's Thirtieth Request for Production of Documents dated November 8, 1993.

GENERAL RESPONSE AND OBJECTIONS

1. Southern Bell objects to Staff's definition of "document" or "documents". Staff'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 does not believe it was Staff's intent to require Southern Bell to produce again the same documents previously 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.

3. The following Specific Responses are given subject to the above-stated General Response and Objectives.

DOCUMENT NUMBER-DATE  
13291 DEC 13 88  
FPSC-RECORDS/REPORTING

SPECIFIC RESPONSES

4. With respect to Request No. 281, Southern Bell objects to this request on the grounds that the information requested is protected by the work product doctrine and is not discoverable under the Florida Rules of Civil Procedure 1.280(4).

5. With respect to Request No. 282, Southern Bell objects to this request on the grounds that the information requested is protected by the work product doctrine and is not discoverable under the Florida Rules of Civil Procedure 1.280(4).

6. With respect to Request No. 283, Southern Bell objects to this request on the grounds that the information requested is protected by the work product doctrine and is not discoverable under the Florida Rules of Civil Procedure 1.280(4).

7. With respect to Request No. 284, Southern Bell objects to this request on the grounds that the information requested is protected by the work product doctrine and is not discoverable under the Florida Rules of Civil Procedure 1.280(4).

8. With respect to Request No. 285, Southern Bell objects to this request on the grounds that the information requested is protected by the work product doctrine and is not discoverable under the Florida Rules of Civil Procedure 1.280(4).

9. With respect to Request No. 286, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

Respectfully submitted this 13th 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 13th day of December, 1993  
to:

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