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CLERK
THE OFFICE

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 Thirty-First 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.

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Sincerely,

Nancy B. White (AW)
Nancy B. White

Enclosures

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

RECEIVED & FILED
MS
DIVISION OF RECORDS

DOCUMENT NUMBER-DATE
13292 DEC 13 93
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 13, 1993
Company)
_____)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
RESPONSE AND OBJECTIONS TO STAFF'S
THIRTY-FIRST 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 Thirty-First Request for Production of Documents dated November 12, 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

13292 DEC 13 83

FPSC-RECORDS/REPORTING

SPECIFIC RESPONSES

4. With respect to Request No. 287, Southern Bell objects to this request on the basis that it is overly broad, unduly burdensome and oppressive in that the request seeks a voluminous amount of material. Notwithstanding the objection, Southern Bell will provide summary documents that are in its possession, custody or control at a mutually convenient time and place.

5. With respect to Request No. 288, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

6. With respect to Request No. 289, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

7. With respect to Request No. 290, Southern Bell objects to this request on the grounds that the request asks for the creation of material which does not currently exist, the improper subject of a request for production of documents. Southern Bell further objects on the grounds that the request is overly broad, burdensome and oppressive. Responding to the request would not only take a significant amount of time, but the 1993 information upon which the response is requested to be based will not be available until March of 1994.

Respectfully submitted this 24th day of November, 1993.

SOUTHERN BELL TELEPHONE
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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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