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ORIGINAL
FILE COPY

December 29, 1994

Mrs. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

RE: Docket No. 920260-TL

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Response to CWA's Second Motion for Clarification. 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 _____

ABA John

APP _____

C&F _____

CR01 Norton

CTY _____

Enclosures

EOB _____

ESC Elias

EW H

OPC _____

BSI Vinson

SGS L

WFO _____

ATH _____

Sincerely,

Nancy B. White
Nancy B. White (22)

RECEIVED & FILED

DEPARTMENT OF RECORDS

DOCUMENT NUMBER-DATE

13030 DEC 29 94

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL
FILE COPY

In re: Comprehensive Review of)
the Revenue Requirements and Rate)
Stabilization Plan of Southern)
Bell Telephone and Telegraph)
Company)

Docket No. 920260-TL

Filed: December 29, 1994

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
RESPONSE TO CWA'S SECOND MOTION FOR CLARIFICATION

COMES NOW, BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell") and, pursuant to Rule 25-22.037(2), Florida Administrative Code, files its response to the Second Motion for Clarification filed by the Communication Workers of America, AFL-CIO ("CWA").

1. On December 21, 1994, the CWA filed a Second Motion for Clarification in which the CWA requested that it be allowed to conduct discovery and that all outstanding discovery motions be resolved. In addition, the CWA alleged that it had been "unable to obtain any discovery"¹ from Southern Bell in this matter.

2. Contrary to the CWA's claim, Southern Bell has provided all appropriate discovery to the CWA. For example, Southern Bell has produced numerous documents relation to the disposition of the \$10 million at issue in response to the CWA's Request for Production of Documents dated August 11, 1994. The remainder of the documents sought are neither relevant, nor reasonably calculated to lead to the discovery of information relevant to the issues in this docket inasmuch as they pertained to the Settlement itself.

¹ Page 1, paragraph 6 of CWA's Second Motion for Clarification, emphasis in original.

DOCUMENT NUMBER-DATE

13030 DEC 29 94

FPSC-RECORDS/REPORTING

3. On December 22, 1994, the Commission issued Order NO. PSC-94-1585-PCO-TL which sets forth the procedural schedule for this matter. The Prehearing Officer has clearly stated in this order that the sole purpose of this docket is to determine the appropriate disposition of the monies resulting from the Settlement approved in Order No. PSC-94-0172-FOF-TL. The propriety of the Settlement, as well as matters pertaining to the mechanics of reaching the Settlement have been deemed by the Prehearing Officer to be irrelevant and not the subject of permissible discovery. In addition, on December 27, 1994, the Prehearing Officer issued Order No. PSC-94-1610-PCO-TL which contained rulings on all outstanding discovery motions. Therefore, the CWA's Second Motion for Clarification should be dismissed as moot.

Wherefore, for the reasons set forth above, Southern Bell respectfully submits that the CWA's Second Motion for Clarification should be dismissed.

Respectfully submitted this 29th day of December, 1994.

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 29th day of December, 1994
to:

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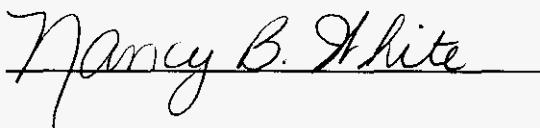
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