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THE COPY

March 30, 1994

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

Re: Docket No. 921074-TP

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of BellSouth Telecommunications, Inc.'s d/b/a Southern Bell Telephone and Telegraph Company's Objections and Responses to Interexchange Access Coalition's First Set of Requests for Production of Documents, to be filed for the Commission's consideration. Service is being provided in accordance with the attached Certificate of Service.

A copy of this letter is enclosed. Please indicate on the copy that the original was filed and return the copy to me. Thank you for your assistance in this matter.

Sincerely,

RECEIVED  
MAR 31 1994  
MJS

Mary Jo Peed  
Mary Jo Peed (MJP)

Enclosures

bcc: H. R. Anthony  
A. M. Lombardo  
R. Douglas Lackey  
All Parties noted on Certificate of Service

DOCUMENT NUMBER-DATE

03011 MAR 30 94

FPSC-RECORDS/REPORTING

BEFORE  
THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Expanded Interconnection	)	DOCKET NO. 921074-TP
Phase II and Local Transport	)	DOCKET NO. 930955-TL
Restructure	)	DOCKET NO. 940014-TL
_____	)	DOCKET NO. 940020-TL
		DOCKET NO. 931196-TL
		DOCKET NO. 940190-TL

FILED: MARCH 30, 1994

**SOUTHERN BELL TELEPHONE AND TELEGRAPH  
COMPANY'S OBJECTIONS AND RESPONSES TO IAC'S  
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 1.350, Florida Rules of Civil Procedures, its Objections and Responses to Interexchange Access Coalition's ("IAC") First Set of Requests for Production of Documents dated February 23, 1994.

**General Responses and Objections**

1. Southern Bell objects to IAC's definition of "document" or "documents". IAC's definition is overly broad and objectionable pursuant to the standards adopted in Caribbean Security Systems v. Security Control Systems, Inc., 486 S.2d 654 (Fla. App. 3rd. Dist. 1986).

2. Southern Bell does not believe it was IAC'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

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unduly burdensome, oppressive, and unnecessary, and for these reasons is prohibited.

3. Southern Bell objects to IAC's requests to the extent that they are overly broad and thus unduly burdensome and oppressive. IAC has requested all documents that "identify, reflect, refer to, or are related in any way..." to various subjects which may be relevant to the subject matter of this proceeding. Such language is overly broad. However, without waiving its objection, Southern Bell has attempted to respond to each of IAC's requests as fully and completely as possible.

4. The following specific responses are subject to the above-stated general responses and objections.

#### Specific Responses

5. In response to Request No. 1, Southern Bell will produce the responsive documents to Request No. 1.

6. In response to Request No. 2, Southern Bell has no documents responsive to Request No. 2.

7. In response to Request No. 3, Southern Bell has no documents responsive to Request No. 3.

8. In response to Request No. 4, Southern Bell will produce the documents responsive to Request No. 4.

9. In response to Request No. 5, Southern Bell has no documents responsive to Request No. 5.

10. In response to Request No. 6, Southern Bell has no documents responsive to Request No. 6.

11. In response to Request No. 7, Southern Bell objects to this request on the basis that the request is overly broad, burdensome and oppressive. Virtually every organization, both at headquarters in Atlanta and Birmingham and field personnel in Florida have documents which "identify, reflect, refer to, or are related in any way to tandems used by Southern Bell to provide access service in Florida." Southern Bell will respond to a more narrowly drawn request.

12. In response to Request No. 8, Southern Bell objects to portions of this request on the grounds that the documents requested contain proprietary confidential business information which is commercially valuable to Southern Bell and other proprietary confidential business information. Southern Bell will produce the responsive documents in its possession, custody or control at mutually convenient time and place, subject to IAC's execution of an appropriate confidentiality agreement.

13. In response to Request No. 9, Southern Bell objects to portions of this request on the grounds that the documents requested contain proprietary confidential business information which is commercially valuable to Southern Bell and other proprietary confidential business information. Southern Bell will produce the responsive documents in its possession, custody or control at mutually convenient time and place, subject to IAC's execution of an appropriate confidentiality agreement.

14. In response to Request No. 10, Southern Bell objects to portions of this request on the grounds that the documents

requested contain proprietary confidential business information which is commercially valuable to Southern Bell and other proprietary confidential business information. Southern Bell will produce the responsive documents in its possession, custody or control at mutually convenient time and place, subject to IAC's execution of an appropriate confidentiality agreement.

15. In response to Request No. 11, Southern Bell objects to portions of this request on the grounds that the documents requested contain proprietary confidential business information concerning contractual data, information which is commercially valuable to Southern Bell and other proprietary confidential business information. Southern Bell will produce the responsive documents in its possession, custody or control at mutually convenient time and place, subject to IAC's execution of an appropriate confidentiality agreement.

16. In response to Request No. 12, Southern Bell objects to portions of this request on the grounds that the documents requested contain proprietary confidential business information concerning contractual data, information which is commercially valuable to Southern Bell and other proprietary confidential business information. Southern Bell will produce the responsive documents in its possession, custody or control at mutually convenient time and place, subject to IAC's execution of an appropriate confidentiality agreement.

17. In response to Request No. 13, Southern Bell objects to portions of this request on the grounds that the documents

requested contain proprietary confidential business information concerning contractual data, information which is commercially valuable to Southern Bell and other proprietary confidential business information. Southern Bell will produce the responsive documents in its possession, custody or control at mutually convenient time and place, subject to IAC's execution of an appropriate confidentiality agreement.

18. In response to Request No. 14, Southern Bell has no documents responsive to Request No. 14.

19. In response to Request No. 15, Southern Bell will file a zone pricing plan for special access service on March 31, 1994, as ordered by the Florida Public Service Commission in Order No. PSC-94-0285-FOF-TP issued March 10, 1994. Further, pursuant to Order No. PSC-94-0277-PCO-TL issued March 10, 1994, Southern Bell will file a proposed zone pricing plan for switched access services on May 15, 1994. Southern Bell has no other documents responsive to Request No. 15.

20. In response to Request No. 16, Southern Bell objects to portions of this request on the grounds that the documents requested contain proprietary confidential business information which is commercially valuable to Southern Bell and other proprietary confidential business information. Southern Bell will produce the responsive documents in its possession, custody or control at mutually convenient time and place, subject to IAC's execution of an appropriate confidentiality agreement.

21. In response to Request No. 17, Southern Bell objects to portions of this request on the grounds that the documents requested contain proprietary confidential business information which is commercially valuable to Southern Bell and other proprietary confidential business information. Southern Bell will produce the responsive documents in its possession, custody or control at mutually convenient time and place, subject to IAC's execution of an appropriate confidentiality agreement.

22. In response to Request No. 18, Southern Bell has no documents responsive to Request No. 18.

23. In response to Request No. 19, Southern Bell objects to portions of this request on the grounds that the documents requested contain proprietary confidential business information concerning contractual data, information which is commercially valuable to Southern Bell and other proprietary confidential business information. Southern Bell will produce the responsive documents in its possession, custody or control at mutually convenient time and place, subject to IAC's execution of an appropriate confidentiality agreement.

24. In response to Request No. 20, Southern Bell has no documents responsive to Request No. 20.

25. In response to Request No. 21, Southern Bell has no documents responsive to Request No. 21.

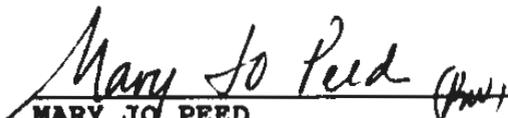
26. In response to Request No. 22, Southern Bell objects to this request on the basis that the request is overly broad, burdensome and oppressive. Virtually every organization, both at

headquarters in Atlanta and Birmingham and field personnel in Florida have documents which "identify, reflect, refer to, or are related in any way to tandems used by Southern Bell to provide access service in Florida." Southern Bell will respond to a more narrowly drawn request.

Respectfully submitted this 30th day of March, 1994.

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**CERTIFICATE OF SERVICE**  
**Docket No. 921074-TP**

I HEREBY CERTIFY that a copy of the foregoing has been  
furnished by United States Mail this 30<sup>th</sup> day of March, 1994,  
to:

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*Mary Jo Reed*  

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