

MARY JO PEED
General Attorney

Southern Bell Telephone
and Telegraph Company
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(404) 529-7208

ORIGINAL
FILE COPY

June 7, 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. 93107-PP

Dear Mrs. Bayo:

Enclosed please find an original and fifteen copies of BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company's Responses and Objections to Staff's Third Request for Production of Documents to Southern Bell and its Notice of Intent to Seek Confidential Classification to be filed in the above mentioned docket for the Commission's consideration.

ACK A copy of this letter is enclosed. Please indicate on the
AFA copy that the original was filed and return the copy to me.
APP _____ Copies have been served on the parties shown on the attached
Certificate of Service.

CAF _____
CIT _____
EAL _____

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Sincerely,

Mary Jo Peed
Mary Jo Peed

LEG *Conzans* Enclosures
LIM *6*

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

WAS _____
OTH _____

DOCUMENT NUMBER - DATE
05603 JUN-7 94
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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 7th day of June, 1994,
to:

Tracy Hatch
Division of Communications
Florida Public Service
Commission
101 East Gaines Street
Tallahassee, FL 32399-0866

Charles Murphy
Division of Legal Services
Florida Public Service
Commission
101 East Gaines Street
Tallahassee, FL 32301

Patrick K. Wiggins
Wiggins & Villacorta, P.A.
Post Office Drawer 1657
Tallahassee, Florida 32302

Intermedia Communications
Suite 270
9280 Bay Plaza Boulevard
Tampa, FL 33619-4453

Charles J. Beck
Deputy Public Counsel
Office of the Public Counsel
111 W. Madison Street
Room 812
Tallahassee, FL 32399-1400

Thomas Parker
GTE Florida Incorporated
P.O. Box 110
MC 616
Tampa, FL 33601-0110

C. Dean Kurtz
Central Telephone Company of
Florida
Post Office Box 2214
Tallahassee, Florida 32316-
2214

Lee L. Willis
Ausley, McMullen, McGehee
Carothers & Proctor
Post Office Box 391
Tallahassee, Florida 32302

Florida Cable Television
Association, Inc.
310 N. Monroe Street
Tallahassee, FL 32301

Brad E. Mutschelknaus
Wiley, Rein, & Fielding
1776 K Street, NW
Washington, D.C. 20006
atty for Interexchange
Access Coalition

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Grandoff and Reeves
Suite 716
315 South Calhoun Street
Tallahassee, FL 32301
atty for FIXCA

Joseph P. Gillan
J. P. Gillan and Associates
Post Office Box 541038
Orlando, FL 32854-1038

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs, Odom &
Ervin
305 South Gasden Street
Tallahassee, FL 32301

Chanthina R. Bryant
Sprint
3065 Cumberland Circle
Atlanta, GA 30339

Peter M. Dunbar, Esq.
David L. Swafford,
Haben, Culpepper, Dunbar
& French, P.A.
Post Office Box 10095
Tallahassee, FL 32302

Paul Jones, Esq.
Time Warner Cable
Corporate Headquarters
300 First Stamford Place
Stamford, CT 06902-6732

Michael W. Tye
Suite 1410
106 East College Avenue
Tallahassee, FL
atty. for AT&T

Harriet Eudy
ALLTEL Florida, Inc.
Post Office Box 550
Live Oak, FL 32060

David B. Erwin
Young, van Assenderp,
Varnadoe & Benton, P.A.
225 South Adams Street
Suite 200
Post Office Box 1833
Tallahassee, FL 32302

Charles Dennis
Indiantown Telephone System
Post Office Box 277
Indiantown, Florida 34956

John A. Carroll, Jr.
Northeast Telephone Company
Post Office Box 485
Macclenny, Florida 32063-0485

Daniel V. Gregory
Quincy Telephone Company
Post Office Box 189
Quincy, Florida 32351

Jeff McGehee
Southland Telephone Company
210 Brookwood Road
Post Office Box 37
Atmore, Alabama 36504

Jodie L. Donovan
Regulatory Counsel
Teleport Communications Group
Inc., Ste. 301
1 Teleport Drive
Staten Island, NY 10311

F. Ben Poag
United Telephone Company of FL
P.O. Box 165000
Altamonte Springs, FL 32716

Lee L. Willis
John P. Fons
Ausley, McMullen, McGehee,
Carothers & Proctor
Post Office Box 391
Tallahassee, FL 32302

May Jo Reed

BEFORE
THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Expanded Interconnection) DOCKET NO. 921074-TP
Phase II and Local Transport)
Restructure)
_____) JUNE 7, 1994

BELLSOUTH TELECOMMUNICATIONS, INC.'S D/B/A
SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
RESPONSES AND OBJECTIONS TO STAFF'S THIRD
REQUEST FOR PRODUCTION OF DOCUMENTS TO
SOUTHERN BELL AND ITS THIRD NOTICE OF
INTENT TO SEEK CONFIDENTIAL CLASSIFICATION

COMES NOW, BellSouth Telecommunications, Inc., doing business as Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company") and files pursuant to Rules 25-22.034 and 25-22.006, Florida Administrative Code and Rule 1.350, Florida Rules of Civil Procedure, its Objections and Responses to Staff's Third Request for Production of Documents and its Third Notice of Intent to Seek Confidential Classification.

Notice of Intent to Seek Confidential Classification

1. On May 3, 1994, the Staff of the Florida Public Service Commission (the "Staff") filed its Third Request for Production of Documents to Southern Bell. Some of the information contained in the documents responsive to Staff's requests are exempted from public disclosure pursuant to §§ 119.07 and 364.183, Florida Statutes. Specifically, some of the documents contain business strategies, plans, customer specific information and other proprietary confidential business information. The information is included as proprietary confidential business information under Section 364.138, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

DOCUMENT NUMBER-DATE

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2. Because some of the responsive documents contain exempt information, Southern Bell is filing this Notice pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, in order to allow the Staff access to the documents without delay. The original of this Notice has been filed with the Division of Records and Reporting and a copy of it has been served on the Division requesting this information.

GENERAL RESPONSES AND OBJECTIONS

3. Southern Bell objects to Staff's definition of "document" or "documents". Staff'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)

4. 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.

SPECIFIC RESPONSES

5. Subject to the general objections, which are incorporated by reference into the specific responses made herein, Southern Bell responds to the individual numbered items of Staff's Third Request for Production of Documents as follows:

A. In response to Request No. 18, Southern Bell objects to this request on the grounds that some of the documents responsive

to this request contain proprietary confidential business information. Southern Bell will produce the documents pursuant its Notice of Intent to Seek Confidential Classification.

B. In response to Request No. 19, Southern Bell has defined access line to mean the local channel associated with local transport restructure and expanded interconnection. Based on this definition, Southern Bell has no documents responsive to this request.

C. In response to Request No. 20 Southern Bell has no documents responsive to this request.

D. In response to Request No. 21, Southern Bell has no documents responsive to this request.

E. In response to Request No. 22, Southern Bell has no documents responsive to this request.

F. In response to Request No. 23, Southern Bell objects to this request on the grounds that some of the documents responsive to this request contain proprietary confidential business information. Southern Bell will produce the documents responsive to this request pursuant to its Notice of Intent to Seek Confidential Classification.

G. In response to Request No. 24, Southern Bell objects to this request on the grounds that some of the documents responsive to this request contain proprietary confidential business information. Southern Bell will produce these documents pursuant to its Notice of Intent to Seek Confidential Classification.

H. In response to Request No. 25, please see documents responsive to Request No. 24.

I. In response to Request No. 26, Southern Bell objects to this request on the grounds that some of the documents responsive to this request contain proprietary confidential business information. Southern Bell will produce the documents responsive to this request pursuant to its Notice of Intent to Seek Confidential Classification.

Respectfully submitted this 17th day of June, 1994.

BELLSOUTH TELECOMMUNICATIONS, INC.
d/b/a SOUTHERN BELL TELEPHONE AND
TELEGRAPH COMPANY

Harris R. Anthony
HARRIS R. ANTHONY (21)
J. PHILLIP CARVER
c/o Marshall M. Criser, III
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301
(305) 347-5555

Mary Jo Peed (21)
MARY JO PEED
675 W. P'tree St., NE, Suite 4300
Atlanta, Georgia 30375
(404) 529-7208