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ORIGINAL  
FILE COPY

August 12, 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. 921074-TL

Dear Mrs. Bayo:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Response and Objections to Staff's Fifth Request for Production of Documents. Please file this document in the above-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 to the parties shown on the attached Certificate of Service.

- ACK
- AFA
- APP
- CAF
- CTR
- ENG
- LIS
- LIN
- OPR
- PEH
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- OTH

RECEIVED & FILED  
FPSC-BUREAU OF RECORDS

Sincerely yours,

Mary Jo Peed (Pw)

Mary Jo Peed

Beith  
man  
Casiano  
Enclosures

cc: All Parties of Record  
A. M. Lombardo  
Robert G. Beatty  
R. Douglas Lackey

DOCUMENT NUMBER-DATE  
08246 AUG 12 94  
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Expanded Interconnection )  
Phase II and Local Transport )  
Restructure )

Docket No. 921074-TL  
Filed: August 12, 1994

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
RESPONSE AND OBJECTIONS TO STAFF'S  
FIFTH 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), its Response and Objections to Staff's Fifth Request for Production of Documents dated July 8, 1994.

GENERAL RESPONSE AND OBJECTIONS

1. Southern Bell objects to Staff's definition of "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. Dist. 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 Objections.

DOCUMENT NUMBER-DATE

08246 AUG 12 8

FPSC-RECORDS/REPORTING

SPECIFIC RESPONSES

4. In response to Request No. 28, Southern Bell will produce responsive documents in its possession, custody, or control at a mutually convenient time and place.

Respectfully submitted this 12th day of August 1994.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY

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**CERTIFICATE OF SERVICE**  
**Dockets No. 921074-TL, 930955-TL,**  
**940014-TL, 940020-TL, 931196-TL, 940190-TL**

I HEREBY CERTIFY that a copy of the foregoing has been  
furnished by United States Mail this *12<sup>th</sup>* day of *Aug.* 1994,  
to:

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