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NANCY B. WHITE
General Attorney

Southern Bell Telephone
and Telegraph Company
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(404) 529-5387

ORIGINAL
FILE COPY

September 15, 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 and Objections to Communication Workers of America's First Request for Production of Documents and Motion for Protective Order. 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.

Sincerely,

Nancy B. White
Nancy B. White (of)

RECEIVED & FILED

EPSC-BUREAU OF RECORDS

- ACK
- ADA *John*
- APP _____
- CAF _____
- CMU *John*
- CTR _____
- EAG _____
- LEG *Hatch*
- LER *G*
- ESP _____
- F *Vinson*
- S *I*
- V _____
- W _____

Enclosures

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

DOCUMENT NUMBER-DATE
09523 SEP 15 1994
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: September 15, 1994
Company)
_____)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
RESPONSE AND OBJECTIONS TO THE COMMUNICATIONS WORKERS OF
AMERICA'S FIRST REQUEST FOR PRODUCTION OF
DOCUMENTS AND MOTION FOR PROTECTIVE ORDER

COMES NOW, BellSouth Telecommunications, Inc., d/b/a
Southern Bell Telephone and Telegraph Company ("Southern Bell"),
and files, (1) pursuant to Rules 25-22.034, Florida
Administrative Code, and Rules 1.280(c) and 1.350 of the Florida
Rules of Civil Procedure, its Responses and Objections to the
Communications Workers of America's ("CWA") First Request for
Production of Documents dated August 11, 1994, and (2) Motion for
Protective Order.

MOTION FOR PROTECTIVE ORDER

Southern Bell objects to producing some of the documents
requested by CWA on the basis that the documents sought contain
proprietary and confidential business information regarding,
among other things, competitively sensitive information, and
information regarding competitive services provided by Southern
Bell. Consequently, Southern Bell moves the Prehearing Officer
to issue a Protective Order directing that discovery not be had
with respect to the proprietary and confidential business
documents referenced more specifically herein, or that discovery
only be had under certain conditions. Southern Bell would be
willing to entertain negotiations regarding producing certain of

DOCUMENT NUMBER-DATE

09523 SEP 15 1994

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these documents to the attorneys representing CWA upon the execution of an appropriate protective agreement.

SPECIFIC RESPONSES

1. With respect to Request No. 1, Southern Bell objects on the grounds that the information sought consists of legal pleadings filed with the Commission and thus, are public record, equally available to the CWA.

2. With respect to Request No. 2, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

3. With respect to Request No. 3, Southern Bell objects on the grounds that the information sought consists of legal pleadings filed with the Commission and thus, are public record, equally available to the CWA.

4. With respect to Request No. 4, Southern Bell objects on the grounds that all relevant information concerning the settlement was filed with the Commission in legal pleadings and thus, are public record, equally available to the CWA. Any information sought beyond such pleadings is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence related to the appropriate distribution of the unallocated \$10 million resulting from the Settlement.

5. With respect to Request No. 5, 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. 6, 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. 7, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

Respectfully submitted this 15th day of September, 1994.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY

Robert G. Beatty
ROBERT G. BEATTY
J. PHILLIP CARVER
c/o Marshall M. Criser
150 South Monroe Street, #400
Tallahassee, FL 32301
(305) 347-5555

R. Douglas Lackey
R. DOUGLAS LACKEY
NANCY B. WHITE
675 W. Peachtree St., N.E., #4300
Atlanta, GA 30375
(404) 529-3862
(404) 529-5387

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 15th day of September, 1994
to:

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

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

Tracy Hatch
Division of Legal Services
Florida Public Svc. Commission
101 East Gaines Street
Tallahassee, FL 32399-0863

Michael J. Henry
MCI Telecommunications Corp.
780 Johnson Ferry Road
Suite 700
Atlanta, Georgia 30342

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Grandoff & Reeves
315 South Calhoun Street
Suite 716
Tallahassee, FL 32301-1838
atty for FIXCA

Richard D. Melson
Hopping Boyd Green & Sams
Post Office Box 6526
Tallahassee, Florida 32314
atty for MCI

Kenneth A. Hoffman
Messer, Vickers, Caparello,
Madsen, Lewis & Metz, PA
Post Office Box 1876
Tallahassee, FL 32302
atty for FPTA

Rick Wright
Regulatory Analyst
Division of Audit and Finance
Florida Public Svc. Commission
101 East Gaines Street
Tallahassee, FL 32399-0865

Michael W. Tye
AT&T Communications of the
Southern States, Inc.
106 East College Avenue
Suite 1410
Tallahassee, Florida 32301

Laura L. Wilson, Esq.
c/o Florida Cable Television
Association, Inc.
Post Office Box 10383
310 North Monroe Street
Tallahassee, FL 32302
atty for FCTA

Dan B. Hendrickson
Post Office Box 1201
Tallahassee, FL 32302
atty for FCAN

Chanthina R. Bryant
Sprint Communications Co.
Limited Partnership
3065 Cumberland Circle
Atlanta, GA 30339

Benjamin H. Dickens, Jr.
Blooston, Mordkofsky,
Jackson & Dickens
2120 L Street, N.W.
Washington, DC 20037
Atty for Fla Ad Hoc

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs, Odom
& Ervin
305 South Gadsen Street
Post Office Drawer 1170
Tallahassee, Florida 32302
atty for Sprint

Angela Green
Florida Public
Telecommunications Assn., Inc.
Suite 710, Barnett Bank Bldg.
315 South Calhoun Street
Tallahassee, FL 32302

Monte Belote
Florida Consumer Action Network
4100 W. Kennedy Blvd., #128
Tampa, FL 33609

Donald L. Bell, Esq.
104 East Third Avenue
Tallahassee, FL 32303
Atty for AARP

Joseph Gillan
J.P. Gillan & Associates
P.O. Box 541038
Orlando, FL 32854-1038

Mark Richard
Attorney for CWA
Locals 3121, 3122, and 3107
304 Palermo Avenue
Coral Gables, FL 33134

Gerald B. Curington
Department of Legal Affairs
2020 Capital Circle, SE
Alexander Building, 2nd Floor
Tallahassee, FL 32301

Mr. Douglas S. Metcalf
Communications Consultants,
Inc.
631 S. Orlando Ave., Suite 250
P. O. Box 1148
Winter Park, FL 32790-1148

Mr. Cecil O. Simpson, Jr.
General Attorney
Mr. Peter Q. Nyce, Jr.
General Attorney
Regulatory Law Office
Office of the Judge
Advocate General
Department of the Army
901 North Stuart Street
Arlington, VA 22203-1837

Mr. Michael Fannon
Cellular One
2735 Capital Circle, NE
Tallahassee, FL 32308

Floyd R. Self, Esq.
Messer, Vickers, Caparello,
Madsen, Lewis, Goldman & Metz
Post Office Box 1876
Tallahassee, FL 32302-1876
Attys for McCaw Cellular

Stan Greer
Division of Communications
Florida Public Svc. Commission
101 East Gaines Street
Tallahassee, FL 32399-0863

Nancy B. White (BJ)