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ORIGINAL
FILE COPY

August 22, 1996

Mrs. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

ACK _____

AFA 3

APP _____

RE: Docket No. 920260-TL

CAF _____

Dear Mrs. Bayo:

CMU Norton

CTR _____

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response and Objections to Palm Beach Newspapers, Inc. and Florida Today's First Request for Production of Documents and Motion for Protective Order. Please file these documents in the captioned docket.

EAG _____

LEG 1

LIN 5

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.

OPC _____

RCH _____

SEC 1

WAS _____

OTH _____

Sincerely,

Nancy B. White
Nancy B. White (NW)

Enclosures

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
W. J. Ellenberg

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: August 22, 1996
Company)
_____)

BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSE AND OBJECTIONS TO
PALM BEACH NEWSPAPERS, INC. AND FLORIDA TODAY'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
AND MOTION FOR PROTECTIVE ORDER

COMES NOW BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), and files, (1) pursuant to Rule 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 Palm Beach Newspapers, Inc. and Florida Today's First Request for Production of Documents dated July 23, 1996, and (2) Motion for Protective Order.

GENERAL OBJECTIONS

1. BellSouth objects to the Production of Document requests to the extent that such requests seek to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such requests are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

2. BellSouth has interpreted the requests to apply to BellSouth's regulated intrastate operations in Florida and will limit its Answers accordingly. To the extent that any interrogatory is intended to apply to matters other than Florida intrastate operations subject to the jurisdiction of the

DOCUMENT NUMBER-DATE

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Commission, BellSouth objects to such interrogatory as irrelevant, overly broad, unduly burdensome, and oppressive.

3. BellSouth objects to each and every interrogatory and instruction to the extent that such interrogatory or instruction calls for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. BellSouth objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission.

5. BellSouth objects to each and every request to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that the requests request proprietary confidential business information which is not subject to the "trade secrets" privilege, BellSouth will make such information available to counsel pursuant to an appropriate Protective Agreement, subject to any other general or specific objection.

SPECIFIC RESPONSES

6. With respect to Request No. 1, BellSouth 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. 2, BellSouth objects to producing the documents requested on the basis that the documents responsive to this request are voluminous and contain customer

specific information, making the request overbroad and unduly burdensome.

8. With respect to Request No. 3, BellSouth refers Palm Beach Newspapers, Inc. and Florida Today to BellSouth's Response to First Production of Documents Request No. 1.

9. With respect to Request No. 4, BellSouth will produce Florida specific responsive documents that are in its possession, custody, or control at a mutually convenient time and place. BellSouth also refers Palm Beach Newspapers, Inc. and Florida Today to BellSouth's Response to First Production of Documents Request No. 2.

10. With respect to Request No. 5, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place subject to the Motion for Temporary Protective Order set forth above.

11. With respect to Request No. 6, BellSouth refers Palm Beach Newspapers, Inc. and Florida Today to BellSouth's Response to First Production of Documents Request No. 5.

12. With respect to Request No. 7, BellSouth objects to this request on the basis that the request seeks vendor specific information that is proprietary, as well as being overbroad, oppressive, and unduly burdensome.

13. With respect to Request No. 8, BellSouth refers Palm Beach Newspapers, Inc. and Florida Today to BellSouth's Response to First Production of Documents Request No. 2.

14. With respect to Request No. 9, BellSouth refers Palm Beach Newspapers, Inc. and Florida Today to BellSouth's Response to First Production of Documents Request Nos. 2 and 7.

15. With respect to Request No. 10, BellSouth refers Palm Beach Newspapers, Inc. and Florida Today to BellSouth's Response to First Production of Documents Request No. 7.

16. With respect to Request No. 11, BellSouth refers Palm Beach Newspapers, Inc. and Florida Today to BellSouth's Response to First Production of Documents Request No. 7.

17. With respect to Request No. 12, BellSouth refers Palm Beach Newspapers, Inc. and Florida Today to BellSouth's Response to First Production of Documents Request No. 7.

18. With respect to Request No. 13, BellSouth has no documents responsive to this request in its possession, custody, or control.

19. With respect to Request No. 14, BellSouth has no documents responsive to this request in its possession, custody, or control.

20. With respect to Request No. 15, BellSouth will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place subject to the Motion for Temporary Protective Order set forth above.

21. With respect to Request No. 16, BellSouth has no documents responsive to this request in its possession, custody, or control.

22. With respect to Request No. 17, BellSouth has no documents responsive to this request in its possession, custody, or control.

23. With respect to Request No. 18, BellSouth refers Palm Beach Newspapers, Inc. and Florida Today to BellSouth's Response to First Production of Documents Request Nos. 2 and 7.

24. With respect to Request No. 19, BellSouth refers Palm Beach Newspapers, Inc. and Florida Today to BellSouth's Response to First Production of Documents Request Nos. 2 and 7.

Respectfully submitted this 22nd day of August, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.

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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 22nd day of August, 1996 to:

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