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SEP 23 1992

RECORDS/REPORTING

September 23, 1992

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

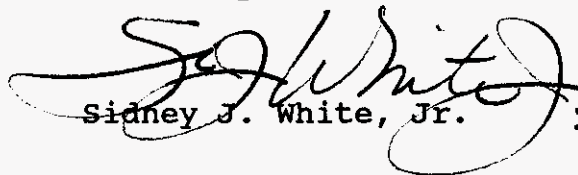
RE: Docket No. 920260-TL

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Response and Objections to Staff's Fourth Request for Production of Documents and Notice of Intent to Request Confidential Classification. 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,

  
Sidney J. White, Jr.

Enclosures

cc: All Parties of Record  
A. M. Lombardo  
H. R. Anthony  
R. D. Lackey

*few*

Note: Confidential DN  
1105-92 is in conf. file

DOCUMENT NUMBER-DATE

11104 SEP 23 1992

FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE**  
**Docket No. 920260-TL**

I HEREBY CERTIFY that a copy of the foregoing has been furnished  
by United States Mail this 23rd day of September, 1992 to:

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Florida Public Svc Commission  
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atty for the Florida Hotel and  
Motel Association

A handwritten signature in black ink, appearing to read "J. J. White". The signature is written in a cursive style with a horizontal line underneath the name.

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 23, 1992  
Company (Formerly FPSC Docket )  
Number 880069-TL) )  
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SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S RESPONSE AND  
OBJECTIONS TO STAFF'S FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS  
AND NOTICE OF INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION

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), Florida Administrative Code, (1) its Response and Objections to Staff's Fourth Request for Production of Documents dated August 19, 1992, and (2) its Notice of Intent to Request Confidential Classification.

NOTICE OF INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION

Some of the documents that will be produced for the Staff in response to its Fourth Request for Production of Documents contain information which is exempted from public disclosure pursuant to §§ 119.07 and 364.183, Florida Statutes. Specifically, some of the documents contain, among other things, vendor-specific contract information, strategic market information, customer-specific information, information on competitive services, other competitively-sensitive information, vendor-specific information, and other Company proprietary confidential business information. This information is included as proprietary confidential business information under § 364.183, Florida Statutes and Rule 25-22.006, Florida Administrative Code.

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

#### GENERAL RESPONSE AND OBJECTIONS

1. Southern Bell objects to Staff's definition of "document" or "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.*, 46 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.

#### SPECIFIC RESPONSES

4. In response to Request No. 98, Southern Bell will produce responsive documents in its possession, custody, or control at a mutually convenient time and place.

5. In response to Request No. 99, Southern Bell objects to this request on the basis that it calls for the production of

proprietary confidential business information. Some of the documents responsive to this request contain, among other things, vendor-specific contract information, strategic market information, customer-specific information, information on competitive services, other competitively-sensitive information, vendor-specific information, and other Company proprietary confidential business information. However, in an effort to be responsive, Southern Bell will produce responsive documents in its possession, custody, or control at a mutually convenient time and place, subject to its Notice of Intent to Request Confidential Classification. In addition, documents responsive to this Request have already been produced by Southern Bell in its production in response to Staff's First Set of Interrogatories, Item No. 11, in Docket No. 920385-TL. Consistent with past practice, these documents are not being produced again in response to this request.

Respectfully submitted this 23rd day of September, 1992.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY

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