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December 29, 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 Thirteenth Request for Production of Documents. Please file this document in the captioned docket.

A copy of this letter is enclosed. Please mark it to

ACK indicate that the original was filed and return the copy to me.

ASA 3 Copies have been served on the parties shown on the attached
certificate of Service.

APP _____

CAF _____

CLM _____

CRB _____

DTB _____

LEE 1 Enclosures

LIN 6 cc: All Parties of Record

ONE _____ A. M. Lombardo

FOH _____ H. R. Anthony

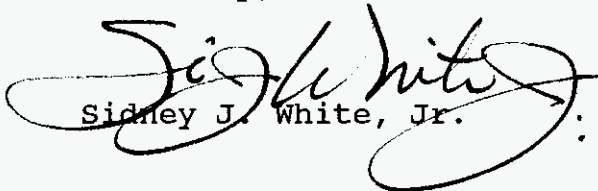
SEC _____ R. D. Lackey

VAS _____

WAS _____

OTH _____
RECEIVED & FILED

Sincerely,


Sidney J. White, Jr.

KP

DOCUMENT NUMBER-DATE
14985 DEC 29 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 29th day of December, 1992 to:

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A handwritten signature in cursive script, appearing to read "J. J. White", with a horizontal line drawn through the middle of the signature.

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: December 29, 1992
Company)
_____)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
RESPONSE AND OBJECTIONS TO STAFF'S THIRTEENTH
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 1.350, Florida Rules of Civil Procedure, its Response and Objections to Staff's Thirteenth Request for Production of Documents dated November 24, 1992.

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 District 1986).

2. The following Specific Responses are given subject to the above-stated General Responses and Objections.

SPECIFIC RESPONSES

3. In response to Request No. 126, Southern Bell does not have the requested documents in its possession, custody or control. Although the Company did receive the letter referenced in Request No. 126, the enclosures mentioned were not attached.


4. In response to Request No. 127, Southern Bell has


previously provided this document to the Commission on September 1, 1992, under a transmittal letter to Mr. Timothy J. Devlin.

5. In response to Request No. 128, Southern Bell has no documents responsive to this request.

Respectfully submitted this 29th day of December 1992.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY


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