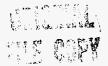
Legal Department

NANCY B. WHITE General Attorney

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



October 22, 1993

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:

RECEIVED & FILED

**EPSC-BUREAU OF RECORDS** 

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Response and Objection to Staff's Twenty-Sixth Request for Production of Documents. Please file this document in the above-captioned docket.

|                  | <b>/</b>                                     | A copy of this letter is enclosed. Please mark it to                       |
|------------------|--|--|
| ACK              | indic  | ate that the original was filed and return the copy to me.                 |
| AFA              | Certi  | s have been served on the parties shown on the attached ficate of Service. |
|                  | 2-277-201-2                                  |  |
| CAF              | Sudans or with a wind a compact years.       | Sincerely,   |
| CMU              | CONTRACTOR OF A SECULAR PROPERTY AND A       | Nancy B. White (bw)  |
| CTR              | фалититиз извучает т.: ческ                  | Nancy B. White   |
| $\mathbf{E}/(0)$ | to see the control of the second             | nancy b. white   |
| LEG              | 1 Maluero                                    | sures  |
|                  | Ø cc:  | All Parties of Record  |
| CFO              | was many party and the state                 | A. M. Lombardo<br>H. R. Anthony  |
| RCH              | more than the first statements               | R. D. Lackey   |
| SHO              | No. 17. (Mary Day)                           |  |
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DOCUMENT NUMBER-DATE

11455 OCT 22 B

FPSC-RECURUS/REPURTING

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of the Revenue Requirements and Rate Stabilization Plan of Southern Bell Telephone and Telegraph Company

Docket No. 920260-TL

Filed: October 22, 1993

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S RESPONSE AND OBJECTIONS TO STAFF'S TWENTY-SIXTH 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), Florida Administrative Code, its Response and Objections to Staff's Twenty-Sixth Request for Production of Documents dated September 17, 1993.

## 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.

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

## SPECIFIC RESPONSES

- 4. In response to Request No. 248, Southern Bell objects to this request on the basis that Southern Bell does not have possession, custody, or control of such information.

  Notwithstanding this objection, the entity in possession of such documents will make them available for review by Staff at the location where they are kept in the ordinary course of business (Atlanta, Georgia).
- 5. With respect to Request No. 249, 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. 250, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place subject to the Request for Confidential Classification to be filed contemporaneously with the serving of Southern Bell's Request for Production of Documents responses.
- 7. With respect to Request No. 251, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.
- 8. With respect to Request No. 252, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.
- 9. With respect to Request No. 253, Southern Bell will produce responsive documents that are in its possession, custody, or control at a mutually convenient time and place.

Respectfully submitted this 22nd day of October, 1993.

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

HARRIS R. ANTHONY

(404) 529-5387

c/o Marshall M. Criser, III Suite 400

150 South Monroe Street
Tallahassee, Florida 32301
(305) 530-5555

R. Douglas Lackey (Bw)

R. DOUGLAS LACKEY
NANCY B. WHITE
4300 Southern Bell Center
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375
(404) 529-3862

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 October, 1993 to:

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

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

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Florida Pay Telephone Association, Inc. c/o Mr. Lance C. Norris President Suite 202 8130 Baymeadows Circle, West Jacksonville, FL 32256

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

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Nancy B. White (Bw)