NANCY B. WHITE General Attorney

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



December 7, 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:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Response and Objections to Staff's Twenty-Ninth Request for Production of Documents. 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.

Nancy B. White

APP \_\_Enclosures

cc: All Parties of Record

A. M. Lombardo H. R. Anthony

R. D. Lackey

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AS TELL PREADOF RECORDS

DOCUMENT NUMBER-DATE

13018 DEC-78

FPSC-RECORDS/REPORTING

## 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: December 7, 1993

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S RESPONSE AND OBJECTIONS TO STAFF'S TWENTY-NINTH 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 Rules 1.280(c) and 1.350 of the Florida Rules of Civil Procedure, its Responses and Objections to the Florida Public Service Commission Staff's ("Staff") Twenty-Ninth Request for Production of Documents dated November 2, 1993.

## SPECIFIC RESPONSES TO STAFF'S TWENTY-NINTH REQUEST FOR PRODUCTION OF DOCUMENTS

- 1. In response to Request No. 270, Southern Bell will provide the requested information for inspection and copying at a mutually agreeable time and place.
- 2. In response to Request No. 271, Southern Bell refers Staff to Southern Bell's response to Staff's Twenty-Eighth Request for Production of Documents, Item No. 263.
- 3. In response to Request No. 272, Southern Bell refers Staff to Southern Bell's response to Public Counsel's interrogatories, Item Nos. 1318 and 1336.
- 4. In response to Request No. 273, Southern Bell will provide the requested information for inspection and copying at a mutually agreeable time and place.

DOCUMENT HUMBER-DATE

13018 DEC-78

FPSC-RECORDS/REPORTING

- 5. In response to Request No. 274, Southern Bell will provide the requested information for inspection and copying at a mutually agreeable time and place.
- 6. In response to Request No. 275, Southern Bell will provide the requested information for inspection and copying at a mutually agreeable time and place. Southern Bell further notes that the documents provided contain information relating to competitive interests unregulated operations, and employee information and constitute the documents which are the subject of the Request for Specified Confidential Classification filed contemporaneously with these response.
- 7. In response to Request No. 276, Southern Bell will provide the requested information for inspection and copying at a mutually agreeable time and place.
- 8. In response to Request No. 277, Southern Bell will provide the requested information for inspection and copying at a mutually agreeable time and place. Southern Bell further notes that the documents provided contain information relating to competitive interests and unregulated operations and constitute the documents which are the subject of the Notice of Intent to Request Specified Confidential Classification filed contemporaneously with these responses.
- 9. In response to Request No. 278, Southern Bell will provide the requested information for inspection and copying at a mutually agreeable time and place.

- 10. In response to Request No. 279, Southern Bell will provide the requested information for inspection and copying at a mutually agreeable time and place.
- 11. In response to Request No. 280, Southern Bell will provide the requested information for inspection and copying at a mutually agreeable time and place.

Respectfully submitted this 7th day of December, 1993.

ATTORNEYS FOR SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

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(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 7th day of December, 1993 to:

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