

NANCY B. WHITE
General Attorney

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

ORIGINAL
FILE COPY

June 15, 1995

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

RE: Docket No. 920260-TL

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Objections to McCaw's Second Set of Interrogatories and Second Set of Requests 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.

Sincerely,

Nancy B. White (Pw)
Nancy B. White

Enclosures

- ACK ✓
- AFA 1
- APP _____
- CAF _____
- CMC 1
- CTR _____
- EAG _____
- LEG 1
- LIN 5
- OPC _____
- RCH Kinson
- SEC 1
- WAS _____
- OTH _____

- All Parties of Record
- A. M. Lombardo
- R. G. Beatty
- R. D. Lackey

RECEIVED & FILED
wa
DIVISION OF RECORDS

DOCUMENT NUMBER-DATE
05568 JUN 15 95
FPSC-RECORDS/REPORTING

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: June 15, 1995
Company)
_____)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
OBJECTIONS TO MCCAW'S SECOND SET OF INTERROGATORIES
AND SECOND SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS

COMES NOW, BellSouth Telecommunications, Inc., d/b/a
Southern Bell Telephone and Telegraph Company ("Southern Bell" or
"Company"), and pursuant to the terms of Order No. PSC-95-0642-
PCO-TL, issued on May 24, 1995, hereby files its objections to
the Second Set of Interrogatories and the Second Request for
Production of Documents submitted by McCaw Communications of
Florida, Inc. ("McCaw").

SPECIFIC OBJECTIONS

1. With respect to Interrogatory Nos. 20-30, Southern Bell
objects on the ground that these requests seek information that
is neither relevant nor reasonably calculated to lead to the
discovery of admissible evidence related to the appropriate
disposition of the \$25 Million revenue reduction that is the
subject of this docket. Moreover, Southern Bell objects to these
requests on the ground that the interrogatories are nothing more
than an attempt by McCaw to conduct post-hearing discovery in
Docket No. 940235-TL, the mobile interconnection docket. Such
discovery is not permitted by the Florida Public Service
Commission rules. In addition, the questions contained in
McCaw's Second Set of interrogatories have previously been
responded to in Docket No. 940235-TL. McCaw's attempt to have

DOCUMENT NUMBER-DATE

05568 JUN 15 95

FPSC-RECORDS/REPORTING

those responses introduced into this docket by means of discovery is improper.

2. With respect to Request for Production Item Nos. 22-32, Southern Bell objects on the ground that these requests seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence related to the appropriate disposition of the \$25 Million revenue reduction that is the subject of this docket. Moreover, Southern Bell objects to these requests on the ground that the production of documents are nothing more than an attempt by McCaw to conduct post-hearing discovery in Docket No. 940235-TL, the mobile interconnection docket. Such discovery is not permitted by the Florida Public Service Commission rules. In addition, McCaw's Second Request for Production of Documents contains specific requests that have been responded to by Southern Bell in Docket No. 940235-TL. McCaw's attempt to have those responses introduced into this docket by means of discovery is improper.

Respectfully submitted this 15th day of June, 1995.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY

Robert M. Beatty (pm)

ROBERT G. BEATTY
c/o Nancy Sims
400 - 150 South Monroe Street
Tallahassee, Florida 32301
(305) 530-5555

R. Douglas Lackey (pm)

R. DOUGLAS LACKEY
NANCY B. WHITE
4300 - 675 W. Peachtree Street, NE
Atlanta, Georgia 30375
(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 15th day of June, 1995 to:

Robin Norton
Division of Communications
Florida Public Service
Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Charles J. Beck
Deputy Public Counsel
Office of the Public Counsel
111 W. Madison Street
Room 812
Tallahassee, FL 32399-1400

Tracy Hatch
Division of Legal Services
Florida Public Svc. Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Michael J. Henry
MCI Telecommunications Corp.
780 Johnson Ferry Road
Suite 700
Atlanta, Georgia 30342

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Grandoff & Reeves
315 South Calhoun Street
Suite 716
Tallahassee, FL 32301-1838
atty for FIXCA

Richard D. Melson
Hopping Boyd Green & Sams
Post Office Box 6526
Tallahassee, Florida 32314
atty for MCI

Kenneth A. Hoffman
Messer, Vickers, Caparello,
Madsen, Lewis & Metz, PA
Post Office Box 1876
Tallahassee, FL 32302
atty for FPTA

Rick Wright
Regulatory Analyst
Division of Audit and Finance
Florida Public Svc. Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Michael W. Tye
AT&T Communications of the
Southern States, Inc.
106 East College Avenue
Suite 1410
Tallahassee, Florida 32301

Laura L. Wilson, Esq.
Florida Cable
Telecommunications Assn., Inc.
310 North Monroe Street
Tallahassee, FL 32301
atty for FCTA

Dan B. Hendrickson
Post Office Box 1201
Tallahassee, FL 32302
atty for FCAN

Chanthina R. Bryant
Sprint Communications Co.
Limited Partnership
3100 Cumberland Circle
Atlanta, GA 30339

Benjamin H. Dickens, Jr.
Blooston, Mordkofsky,
Jackson & Dickens
2120 L Street, N.W.
Washington, DC 20037
Atty for Fla Ad Hoc

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs, Odom
& Ervin
305 South Gadsden Street
Post Office Drawer 1170
Tallahassee, Florida 32302
atty for Sprint

Angela Green
Florida Public
Telecommunications Assn., Inc.
125 South Gadsden Street
Suite 200
Tallahassee, FL 32301

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

Donald L. Bell, Esq.
104 East Third Avenue
Tallahassee, FL 32303
Atty for AARP

Joseph Gillan
J.P. Gillan & Associates
P.O. Box 541038
Orlando, FL 32854-1038

Mark Richard
Attorney for CWA
Locals 3121, 3122, and 3107
304 Palermo Avenue
Coral Gables, FL 33134

Gerald B. Curington
Department of Legal Affairs
2020 Capital Circle, SE
Alexander Building, 2nd Floor
Tallahassee, FL 32301

Mr. Douglas S. Metcalf
Communications Consultants,
Inc.
631 S. Orlando Ave., Suite 250
P. O. Box 1148
Winter Park, FL 32790-1148

Mr. Cecil O. Simpson, Jr.
General Attorney
Mr. Peter Q. Nyce, Jr.
General Attorney
Regulatory Law Office
Office of the Judge
Advocate General
Department of the Army
901 North Stuart Street
Arlington, VA 22203-1837

Mr. Michael Fannon
Cellular One
2735 Capital Circle, NE
Tallahassee, FL 32308

Floyd R. Self, Esq.
Messer, Vickers, Caparello,
Madsen, Lewis, Goldman & Metz
Post Office Box 1876
Tallahassee, FL 32302-1876
Attys for McCaw Cellular

Stan Greer
Division of Communications
Florida Public Svc. Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Nancy B. White (for)