

David M. Falgout
General Attorney

Southern Bell Telephone
and Telegraph Company
Suite 4300 - Legal Department
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375
404 529-3865

November 21, 1990

Mr. Steve Tribble
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

ORIGINAL
FILE COPY

Re: FPSC Docket No. 891194-TL

Dear Mr. Tribble:

This letter is to notify you that today Southern Bell Telephone and Telegraph Company responded to Hearing Officer Easley's oral order of November 15, 1990 instructing Southern Bell to produce an index of all documents either redacted or not produced by Southern Bell in response to Citizens' First and Second Requests for Production of Documents in the captioned docket based on an objection of relevancy.

In an effort to resolve the pending discovery dispute, Southern Bell has also produced the documents that had been previously redacted or withheld, except for one document that may be proprietary to AT&T. I have enclosed for filing a copy of my letter of this date to Public Counsel along with a copy of the index provided to him.

A copy of this letter is also enclosed. Please indicate on the copy that the original was filed and return the copy to me. All parties of record have been served in accordance with the attached Certificate of Service.

ACK _____
AFA _____
APR _____
CAF _____
CML _____
CTS _____
EAC _____
LEG / Enclosures _____
LIN (cc): H. R. Anthony
OPC _____ A. M. Lombardo
RCH _____ R. D. L ckey
SEC _____
WAS _____
GTH _____

Very truly yours,

David M. Falgout
David M. Falgout

RECEIVED & FILED

A SOUTHERN BELL Company

DOCUMENT NUMBER DATE
10446 NOV 21 1990
80-RECORDS/REPORTING

FPSC BUREAU OF RECORDS

David M. Faigouet
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Southern Bell Telephone
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675 West Peachtree Street, N.E.
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404 529-3865

BY HAND DELIVERY

November 21, 1990

Mr. Charles J. Beck
Associate Public Counsel
c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, Florida 32399-1400

Re: FPSC Docket No. 891194-TL

Dear Charlie:

On November 15, 1990, Commissioner Easley directed Southern Bell to prepare an index of those documents that were either redacted or not produced by Southern Bell in response to Citizens' First and Second Requests for Production of Documents based on objections of relevancy. I have enclosed such an index which identifies the twenty-two documents that were redacted, the name and date of each document, and the nature of the reaction(s). This index also identifies two documents that were withheld in their entirety pursuant to the relevancy objection.

By providing you with this index, we believe we have complied fully with Commissioner Easley's oral order. In an effort to resolve this discovery dispute, however, we are also providing to you each of the twenty-two previously redacted documents in their original form and one of the two documents that were originally withheld pursuant to the relevancy objection. (The second document that was originally withheld is marked "AT&T proprietary." I have notified AT&T that this document is subject to a pending discovery request and have requested that AT&T advise me if the document can be released without proprietary cover).

Southern Bell is providing these documents to you solely to help resolve the pending discovery dispute. We do not intend for this action to have any precedential value and

A BELL SOUTH COMPANY

DOCUMENT NUMBER DATE

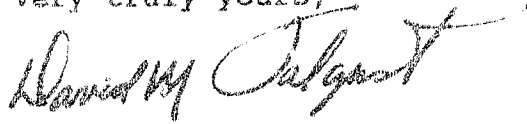
10445 NOV 21 1990

60-RECORDS/REPORTING

Mr. Charles J. Beck
November 21, 1990
Page 2

specifically reserve our right to assert relevancy objections in the future.

Very truly yours,

A handwritten signature in cursive script, appearing to read "David M. Falgoust".

David M. Falgoust

Enclosures

cc: H. R. Anthony
A. M. Lombardo
R. D. Lackey

SOUTHERN BELL INDEX OF
INFORMATION REDACTED OR NOT PRODUCED
PURSUANT TO OBJECTION OF RELEVANCY

1. Document Name:

Focus Groups Among Call Tracing Customers and Disconnects in Orlando, Atlanta & Gainesville, Georgia.

Date of Document:

July, 1990

Redaction(s):

P. 2, paragraph 1; References South Central Bell Staff increases necessary to deal with Call Tracing.

P. 2, paragraph 4; References Gainesville, Ga. customers' lack of understanding of Call Tracing; deletes quotation from a customer.

P.3-4, paragraph 9; References a specific comment by an Atlanta woman about Annoyance Call Center.

P. 9, paragraph 1; References a complaint by an Atlanta man about Touchstar Services.

2. Document Name:

Touchstar CCS7 Network Cost Study

Date of Document:

May 9, 1988

Redaction(s):

P. 1 - monthly cost per line per feature of eight other BellSouth states.

3. Document Name:

Touchstar CCS7 Network Cost Study

Date of Document:

May 9, 1988

Redaction(s):

P. 4, para. 10; Name of BellCore employee.

4. Document Name:

Touchstar Cost Summary: Call Trace

Date of Document:

May 9, 1988

Redaction(s):

Grid of total cost per month per line of states other than Florida.

5. Document Name:

Touchstar Cost Summary

Date of Document:

May 9, 1988

Redaction(s):

Recurring Annual SCIS Investment per line and Monthly Cost per line of states other than Florida.

6. Document Name:

Calling Number Delivery
The Privacy Issue - A Position Paper

Date of Document:

October, 1988

Redaction(s):

Attachment A - Nonpub Listings
Number of Nonpubs in service and percent penetration

All states except Fla. redacted (SCB total not redacted:
this was an error)

7. Document Name:

Memo to Jim Gadd from J.C. Edwards

Date of Document:

11-1-88

Redaction(s):

P. 1 Redacted: Reference to a legal opinion about private listing tariff in North Carolina.

8. Document Name:

Position Paper on Non-pub (Private) Listings Service and the Privacy Issues

Date of Document:

1-19-88

Redaction(s):

6th Page (unnumbered) - Revenues and percent growth 1984 through 9/88 are redacted - Also redacted are the tariffed rates in other states.

9. Document Name:

Caller ID Stakeholder Communications Plan

Date of Document:

7/17/89

Redaction(s):

P. 12 - anticipated tariff filing dates for all states except Fl.

P. 20 - Operator Assistance Charges & Non-pub listing charge redacted for all states except. FL.

10. Document Name:

Overhead projections: Caller ID
A New Touchstar Feature
Jim Whitehead
Lines of Business
BellSouth Services

Redaction(s):

- page entitled: Touchstar Availability
Georgia Deployment Schedules are redacted.
- page entitled: Touchstar Deployment
N.C., GA., Tn., Miss., LA. Schedules are redacted.
- page entitled: Additional Planned 1989 Deployment
Other states are redacted.
- page entitled: Touchstar Forecast (\$M)
South Central Bell and total BellSouth revenues are redacted.
- page entitled: Sales Results
South Central Bell, La., Miss., Tn., Ga., and N.C. results are redacted.
- The fact that a specific city in South Central Bell exceeded forecast is redacted.

11. Document Name:

Memo to J.C. Edwards from Kathy Seabolt

Date of Document:

6-14-88

Redaction(s):

Caller ID Communications Plan

P. 6 - States other than Florida that intended to file in 3Q '89

Reference to filing dates in other South Central Bell states

12. Document Name:

Memo to Bigelow and Garriott from Jerry Dick
Sub: Touchstar Service Caller ID

Date of Document:

5/5/89

Redaction(s):

Schedules for tariff development and deployment

13. Document Name:

Memo to Milton Berryhill from Jerry Dick
Sub: Competitive and Demand Analysis - Touchstar Service

Date of Document:

1/14/89

Redaction(s):

P. 1, paragraph 3 - Specific reference to which states would
be filing tariff during 2Q '89.

P. 2, paragraph 1 - Deployment schedule for S.C.

14. Document Name:

Caller ID Status Update

Date of Document:

(Undated)

Redaction(s):

- page entitled: Caller ID Stakeholder Issues

Reference to consumer advisory boards in states other than
Fla.

Reference to South Central Bell planned consumer advisory
boards.

15. Document Name:

Caller ID Status Update

Date of Document:

(undated)

Redaction(s):

- Page entitled: Caller ID Stakeholder Issues

Reference to internal stakeholder efforts in states other
than Fla.

16. Document Name:
Caller ID Status Update
Date of Document:
(undated)
Redaction(s):
- Page entitled: Caller ID Regulatory Issues (Second Unnumbered page)
Reference to other "lead" states

17. Document Name:
Touchstar Service
Date of Document:
(Undated)
Redaction(s):
- Page entitled: 1989 Touchstar Plans
Network Access Lines and Service Dates with respect to cities other than Fla. cities.

18. Document Name:
Touchstar Service
Date of Document:
(undated)
Redaction(s):
- Page entitled: Role of BSS Produce Management
Reference to call block #2 in Memphis

19. Document Name:
Memo from Jim Whitehead to Will Hendrick
Date of Document:
6/13/89

Redaction(s):

Summary of Comments from the State Consumer Advisory Boards
Concerning Caller ID

PP. 1-2 - References to the meetings in states other than
Florida

20. Document Name:

Marketing Research FILA Caller ID/Call Blocking
Study -

Date of Document:

October 1989 Stamped: "Preliminary:

Redaction(s):

Telephone interviews were conducted in Fla. & Tennessee
Throughout this 64 page document, all references to
Tennessee specific information were redacted.

21. Document Name:

Touchstar Service Implementation Team Meeting
Atlanta

Date of Document:

8/7/89

Redaction(s):

P. 1 - Reference to advertising plans for N.C. and Ga.

PP. 2,3 - State reports for states other than Florida.

22. Document Name:

Marketing Research FILA Caller ID/ Call Blocking
Study

Date of Document:

October 1989

Redaction(s):

Telephone interviews were conducted in Fla. and Tennessee.
Throughout this 64 page document, all references to
Tennessee - specific information were redacted.

Two Additional documents were not produced at all pursuant to relevancy objection:

23. Letter from Sessoms to Swearingen 9/20/89 (Contains no Florida specific information)
24. Touchstar & Interconnect Services - A Qualitative Evaluation Nov. 1989 (conducted in Memphis, Tennessee)*

* This document may be proprietary to AT&T.

CERTIFICATE OF SERVICE
Docket No. 891194-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 21st day of November, 1990

to:

Walter D'Haeseleer
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Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0866

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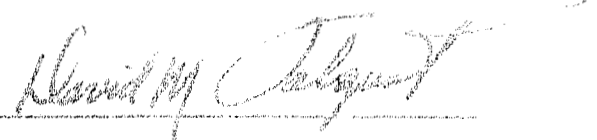
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David M. Tolson