

Harris R. Anthony
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Southern Bell Telephone
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May 22, 1991

Mr. Steve C. Tribble
Director, Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

Re: Docket No. 910163-TL - Repair Service Investigation

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Response and Objections to Staff's Second Request for Production of Documents and Notice of Intent to Request Specified Confidential Classification which we ask that you file in the above-referenced 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 to the parties shown on the attached Certificate of Service.

Sincerely yours,

Harris R. Anthony
Harris R. Anthony
(22)

Enclosures

cc: All Parties of Record
A. M. Lombardo
R. Douglas Lackey

RECEIVED & FILED

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05208 MAY 22 1991

A BELL SOUTH Company

SC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 910163-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this *20nd* day of *May*, 1991,
to:

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

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

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

Harold Anthony

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition on behalf of Citizens) Docket No. 910163-TL
of the State of Florida to initiate)
investigation into integrity of) Filed: May 22, 1991
Southern Bell Telephone and Telegraph)
Company's repair service activities)
and reports.)
_____)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
RESPONSE AND OBJECTIONS TO STAFF'S SECOND REQUEST FOR
PRODUCTION OF DOCUMENTS AND NOTICE OF INTENT TO
REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATION

COMES NOW, Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company") and files: (1) its Response and Objections to the Staff's Second Request for Production of Documents; and (2) its Notice of Intent to Request Confidential Classification.

NOTICE OF INTENT TO REQUEST
SPECIFIED CONFIDENTIAL CLASSIFICATION

Many of the documents that will be delivered to and reviewed by Florida Public Service Commission Staff ("Staff") in response to its Second Request for Production of Documents contain information which is exempted from disclosure pursuant to Section 119.07, Florida Statutes. Specifically, a number of the documents reflect customer information, including the customer's name, address, telephone number and, occasionally, other identifying information. Because these documents contain exempt information, Southern Bell is filing this Notice of Intent to Request Confidential Classification, pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, in order to allow the

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Staff to take possession of the documents without delay. The original of this Notice has been filed with the Division of Records and Reporting, and a copy has been served on the division requesting the information. The written staff request, its Second Request for Production of Documents, has already been filed with the Division of Records and Reporting.

SPECIFIC RESPONSES AND OBJECTIONS TO STAFF'S
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS

1. In response to Request No. 1, Southern Bell has or will furnish to the Staff, the requested MTAS data in machine readable form, including a written description of the MTAS data fields, current and past copies of what is identified as the LMOS/MLT Performance Aid and a BellSouth Practice which provides definitions and explanations of terms used in MTAS. Those documents which have not previously been provided will be produced at a mutually agreeable time and place.

2. In response to Request No. 2, a document with the requested dates will be produced for inspection and copying at a mutually agreeable time and place.

3. In response to Request No. 3, Southern Bell will provide the requested information for inspection and copying at a mutually convenient time and place. Southern Bell further notes that these documents will contain customer specific information, such as names, addresses and other identifying information, and constitute the documents which are the subject of the Notice of Intent to Request Specified Confidential Information set forth

above.


4. In response to Request No. 4, a document containing the requested information will be produced for inspection and copying at a mutually agreeable time and place.


5. In response to Request No. 5, the document requested has previously been provided to the Staff in printed form. Where possible Southern Bell will provide the requested information in machine readable form.

6. In response to Request No. 6, Southern Bell has or will produce all completed investigations and related documents which are responsive to the request. Southern Bell objects to providing the current ongoing investigation into these matters on the grounds that doing so could interfere with the completion of the internal investigation the Southern Bell Legal Department is conducting and could interfere in other pending investigations as well. In addition, the investigation which is being conducted by and under the direction of the Southern Bell Legal Department contains attorney-client privileged material and constitutes attorney work product. The specific materials covered include interviews with employees, analyses of the interviews and other documents related to the conduct of the investigation.

Respectfully submitted this 22nd day of May 1991.

ATTORNEYS FOR SOUTHERN BELL
TELEPHONE AND TELEGRAPH COMPANY


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