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February 25, 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 - 900960-TL - 910163-TL - 910727-TL

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Request for Confidential Classification, which we ask that you file 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 to the parties shown on the attached Certificate of Service.

Sincerely yours,

*J. Phillip Carver*  
J. Phillip Carver  
(2/)

Enclosures

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

**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 *25<sup>th</sup>* day of *Feb.*, 1993  
to:

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*Harris R. Anthony*  
(2R)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of the Revenue Requirements and Rate Stabilization Plan of Southern Bell Telephone & Telegraph Company	)	Docket No. 920260-TL
In re: Investigation into Southern Bell Telephone and Telegraph Company's Non-Contact Sales Practices	)	Docket No. 900960-TL
In re: Petition on behalf of Citizens of the State of Florida to initiate investigation into integrity of Southern Bell Telephone and Telegraph Company's repair service activities and reports.	)	Docket No. 910163-TL
In re: Investigation into Southern Bell Telephone and Telegraph Company's Compliance with Rule 25-4.110(2) (Rebates)	)	Docket No. 910727-TL Filed: February 25, 1993

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION

COMES NOW BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), pursuant to Rule 25-22.006, Florida Administrative Code, and hereby files its Request for Confidential Classification of certain information provided to the Florida Public Service Commission ("Commission") Staff in response to Audit Requests made pursuant to Audits that were conducted in connection with the above-referenced dockets.

1. Pursuant to the above captioned dockets, Commission Staff undertook two related audits: an Audit of Southern Bell's "Repair Process Controls" and an Audit of Southern Bell's "Non-Contact Sales Incentive Program Controls."

2. During the course of those audits, Southern Bell produced to the Commission Staff certain documents that have been retained among the Audit workpapers. These include copies of reports of Southern Bell audits that were prepared by internal auditors employed by Southern Bell.

3. The audit exit conference between Southern Bell and the Commission Staff for the above-referenced Audits was conducted, and immediately afterward Southern Bell filed, on January 27, 1993, its Notice of Intent to Seek Confidential Classification, for both the above referenced internal audits and for substantive references to these internal audits that were contained in the preliminary drafts of the Final Reports on these two Audits. Pursuant to the provisions of Rule 25-22.006(3)(a), Florida Administrative Code, Southern Bell filed on February 17, 1993, its request for confidential classification for the confidential material in question.

4. On February 23, 1993, the Commission Staff provided to Southern Bell the final versions of the above-referenced Audit Reports. At the same time, the Staff directed Southern Bell to make any requests for confidential classification of material contained in these reports by Noon, February 25, 1993.

5. The final drafts of the Audit Report also contain substantive references to the internal audits of Southern Bell. Therefore, in accord with Rule 25-22.006, Florida Administrative Code, Southern Bell now files this request for confidential classification of this information. Specifically, Southern Bell

seeks confidential classification for information that has been taken from Southern Bell's audits that were conducted by its own internal auditors. These internal audits were provided to Staff in response to requests that were made pursuant to the above-described Staff audits. This confidential information was taken by Staff auditors directly from Southern Bell's internal audits and referenced in the Staff's Final Audit Reports for each of the above-referenced Audits. Under Section 364.183(3)(b), Florida Statutes, "internal auditing controls and reports of internal auditors" are specifically exempted from the public disclosure requirements of Section 119.07(1). Thus, under the express provisions of Section 364.183 this material is entitled to the confidential treatment sought herein.

6. Southern Bell has filed as Attachment "A" a listing of specific pages and lines of the Audit Reports that contain proprietary confidential business information along with a specific justification for the respective requests for confidentiality. Southern Bell has also filed two redacted copies of Audit Reports as Attachment "B." Finally, Southern Bell has filed a highlighted version of the Reports in a sealed container, which is marked as Attachment "C."

7. All of the information identified above for which Southern Bell seeks confidential classification has been treated confidentially by Southern Bell in that it has not been disclosed to any third party except to the extent that it may have been disclosed "pursuant to a statutory provision, an order of a

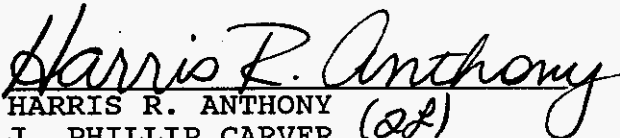
court of administrative body, or private agreement that provides that the information will not be released to the public."


Florida Statutes, Section 364.183(3).

WHEREFORE, Southern Bell requests that the Commission grant its Request for Confidential Classification.

Respectfully submitted,

ATTORNEYS FOR SOUTHERN BELL  
TELEPHONE AND TELEGRAPH COMPANY

  
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ATTACHMENT "A"

INDEX OF PROPRIETARY INFORMATION FOR

NON-CONTACT SALES INCENTIVE PROGRAM CONTROLS AUDIT REPORT

Justification: The following information is considered by Southern Bell to be proprietary in that it was derived from or refers to internal auditing controls and reports of internal auditors, and is therefore confidential pursuant to Section 364.183(3)(b) of Florida Statutes.

<u>PAGE</u>	<u>LINE(S)</u>	
30	14-30	See Above
31	14-34	See Above
55	29-31	See Above



**ATTACHMENT "A"**  
**INDEX OF PROPRIETARY INFORMATION FOR**  
**REPAIR PROCESS CONTROLS AUDIT REPORT**

Justification: The following information is considered by Southern Bell to be proprietary in that it was derived from or refers to internal auditing controls and reports of internal auditors, and is therefore confidential pursuant to Section 364.183(3)(b) of Florida Statutes.

<u>PAGE</u>	<u>LINE(S)</u>	
27	13-15	See Above
37	26-30	See Above
49	26-29	See Above
50	1-8	See Above