NANCY B. WHITE General Attorney

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

March 4, 1993

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

> Docket No. 920260-TL, 900960-TL, 910163-TL, 910727-TL RE:

Dear Mr. Tribble:

Enclosed is an original and fifteen copies of a Southern Bell Telephone and Telegraph Company's Request for Confidential Classification. Please file this document in the above-captioned dockets.

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.

Enclosures

cc: All Parties of Record

A. M. Lombardo H. R. Anthony

R. D. Lackey

DOCUMENT NUMBER-DATE

02487 MAR-48

FPSC-RECORDS/REPORTING

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 4th day of March, 1993 to:

Robin Norton
Division of Communications
Florida Public Service
Commission
101 East Gaines Street
Tallahassee, FL 32399-0866

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

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

Joseph Gillan J. P. Gillan and Associates Post Office Box 541038 Orlando, Florida 32854-1038

Patrick K. Wiggins
Wiggins & Villacorta, P.A.
Post Office Drawer 1657
Tallahassee, Florida 32302
atty for Intermedia and Cox

Laura L. Wilson, Esq.
Messer, Vickers, Caparello,
Madsen, Lewis & Metz, PA
Post Office Box 1876
Tallahassee, FL 32302
atty for FPTA

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

Michael J. Henry MCI Telecommunications Corp. MCI Center Three Ravinia Drive Atlanta, Georgia 30346-2102

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

Rick Wright
Regulatory Analyst
Division of Audit and Finance
Florida Public Svc. Commission
101 East Gaines Street
Tallahassee, FL 32399-0865

Peter M. Dunbar
Haben, Culpepper, Dunbar
& French, P.A.
306 North Monroe Street
Post Office Box 10095
Tallahassee, FL 32301
atty for FCTA

Chanthina R. Bryant Sprint 3065 Cumberland Circle Atlanta, GA 30339 Michael W. Tye
AT&T Communications of the
Southern States, Inc.
106 East College Avenue
Suite 1410
Tallahassee, Florida 32301

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

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 Gadsen Street
Post Office Drawer 1170
Tallahassee, Florida 32302
atty for Sprint

Florida Pay Telephone Association, Inc. c/o Mr. Lance C. Norris President Suite 202 8130 Baymeadows Circle, West Jacksonville, FL 32256

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

Bill L. Bryant, Jr., Esq. Foley & Lardner Suite 450 215 South Monroe Street Tallahassee, FL 32302-0508 Atty for AARP Michael B. Twomey Assistant Attorney General Department of Legal Affairs Room 1603, The Capitol Tallahassee, FL 32399-1050

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

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

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

Many Burhite

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. 900960-TL

Docket No. 920260-TL

In re: Show cause proceeding against Southern Bell Telephone and Telegraph Company for misbilling customers

Docket No. 910163-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

In re: Investigation into Southern Bell Telephone and Telegraph Company's compliance with Rule 25-4.110(2), F.A.C., Rebates Docket No. 910727-TL

Filed: March 4, 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 files its Request for Confidential Classification regarding certain late-filed exhibits requested by the Staff and the Office of Public Counsel ("Public Counsel") at the deposition of Wayne Tubaugh taken on January 14, 1993. In support of its Request, Southern Bell shows the following:

1. On January 14, 1993, the Staff of the Florida Public Service Commission conducted a deposition of Wayne Tubaugh, an employee of Southern Bell. During the course of the deposition, both Staff and Public Counsel requested that Mr. Tubaugh submit

certain late-filed exhibits.

- 2. Southern Bell has gathered a portion of the exhibits, those being Exhibits Nos. 1 and 2, which contain confidential information. Therefore, Southern Bell herewith files its Request for Confidential Classification for the information contained in the documents being delivered to Staff.
- 3. Southern Bell has appended to this Request for Confidential Classification as Attachment "A" a listing of the location in the documents of the information designated by Southern Bell as confidential, together with statements indicating why the material should be treated as proprietary confidential business information.
- 4. Appended hereto in an envelope designated as Attachment "B" are two copies of the document with the confidential information deleted.
- 5. Appended hereto in an envelope designated as Attachment "C" are copies of the documents with the proprietary information highlighted.
- 6. The information deemed to be confidential by Southern Bell and identified in Attachment "A" contains, among other things, customer-specific information, including the name, address, and telephone number of subscribers. This information is entitled to confidential classification, and this Commission has consistently protected such customer-specific information from public disclosure. Moreover, § 119.07(3)(w) specifically provides that information such as customers' names, addresses,

and telephone numbers are exempt from the inspection and examination provisions of the Public Records Act.

7. In accordance with Rule 25-22.006, Florida
Administrative Code, this information for which confidential
treatment is sought is intended to be and is treated by the
Company as private and has not been disclosed on a
nonconfidential basis.

WHEREFORE, Southern Bell Telephone and Telegraph Company moves the Prehearing Officer to enter an Order declaring the information described above, and contained in the indicated portions of the attached exhibits, to be confidential, proprietary business information and thus not subject to public disclosure.

Respectfully submitted this 4th day of March, 1993.

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

HARRIS R. ANTHONY

J. PHILLIP CARVER

c/o Marshall M. Criser

400 - 150 South Monroe Street Tallahassee, Florida 32301

(305) 530-5555

R. DOUGLAS LACKEY

NANCY B. WHITE

4300 - 675 West Peachtree St., N.E.

Atlanta, Georgia 30375

(404) 529-3862

(404) 529-5387

Attachment A
Wayne Tubaugh
Late Filed Deposition
Exhibit Nos. 1 & 2
January 14, 1993
Page 1 of 7

FPSC DOCKET 920260-TL SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXPLANATION FOR PROPRIETARY INFORMATION

This information reflects customer specific information. The Commission has always zealously protected customer specific information in order to protect the customer's privacy and prevent a competitor of the customer from obtaining an unfair advantage. As such, this information is classified as confidential business information pursuant to Section 364.183, Florida Statutes, and is exempt from the Open Records Act.

LOCATION OF PROPRIETARY MATERIAL

Item 1(a)

PAGE	LINE NO.
F01B10V00001	1-34
00002	4-8
00003	5-9, 12, 13, 15
00004	4-7, 10, 13
00005	4-7, 15, 22, 25, 31
00006	8, 9, 11
00007	5-9
80000	4-8, 10, 11, 25, 27, 28, 32
00009	5-9
00010	4-7, 11, 12
00011	4-7, 14
00013	5-9, 11
00014	4-7
00015	5-9
00016	4-7
00017	5-9, 15, 18
00018	4-7
00019	5, 7-9
00020	4-7, 11, 13

Item 1(a) cont.

```
PAGE
                   LINE NO.
                         4-7, 18, 19, 21, 24, 31, 32
F01B10V00021
                         1, 4, 7, 9-14, 16, 17
       00022
                         5-8
       00023
                         4-7, 12, 14
       00024
                         4-7, 14, 15, 24, 29, 36, 38
       00025
                         2, 4, 5, 10, 13, 14, 17, 20, 23
       00026
                         4, 6, 25, 31, 35
       00027
                         6, 16, 24, 27, 29, 31, 32
       00028
                         5, 32
       00029
                         5-9, 16
       00030
                         4-7
       00031
       00032
                         5, 7-9
                         1, 3-6, 20, 30
       00033
                         4 - 7
       00034
                          5-9, 11
       00036
                         4 - 8
       00037
       00038
                         4
       00039
                         4 - 7
       00041
                         4 - 8
                         5-9
       00042
                         4-7
       00043
                         4-7, 22
       00044
       00045
                         5-9
                         4 - 7
       00046
                         5-9, 11
       00047
                         4-7, 10, 17, 18
       00048
       00049
                         4, 5, 7, 8, 11-13
       00050
                         4-8, 11, 12
                         4-8, 11, 12, 14, 15, 17, 29, 30, 36
       00051
       00052
                         3
                         5-9
       00053
                         5, 6
       00054
       00055
                         1-4, 8
                         4 - 7
       00056
       00057
                         5, 7-9
                         4-7
       00058
       00059
                         4 - 7
       00061
                         6, 8, 9
                          5, 7-9, 12, 13
       00062
                         1-4
       00063
                         1-4, 12, 13
       00064
       00065
                         30, 31
       00066
                         4 - 7
                         4-7, 17
       00067
                         5-9
       00068
                         5-9
       00069
```

Item 1(a) cont.

<u>.</u> . .

PAGE	LINE NO.	
F01B10V00070 00071 00072	4-7 2-5, 7, 8 2-5	gig Seri
00073	4-7, 13, 14	. •
00074	5, 7, 8	
00075	5, 7, 8	
00076	1-4	
00077	1-4, 9, 22, 23, 24	
00078	1-4, 11-16, 29-31	
00079	4-7	
00080	4-7	
00081	4-7, 16	
00082	5, 7-9	
00083	4-7	
00085	5-9 4-7	
00086	4-7	
00087 00088	14, 15	
00089	5-9	
00090	4-8, 11, 12, 14, 26, 34, 35	
00091	2, 3, 5, 11, 13, 14, 18, 21, 22, 24, 2	26. 32.
00031	34, 37	.07 327
00092	5-9	
00093	4-7, 11	
00094	4-7, 16, 18, 22, 25, 28, 32	
00096	5-8, 12	
00097	4-7	
00098	4-7	
00099	4-7	
00100	4-7	
00101	4-7	
00102	4-7	
00103	4-7	
00104	4-7	
00105	5, 6	
00106	5, 6	
00107	5-8, 11	
00108	4-7	
00109	4-7	
00110	4-8	
00111	2-5, 10	
00112	5	
00113	4-7	

Item 1(a) cont.

PAGE	LINE NO.
F01B10V00114	4-7 5-9, 11 5, 6, 8, 9 4-7 25 5-9, 11 4-8 2, 4, 5 4-7 4-7, 11 8, 9, 11, 12, 16, 17, 20, 21 4-7, 10 4-7 5-9, 11 4-7 5-9, 11, 12 4-6, 9, 16, 22, 25, 26, 28 5, 7-9 4-7 4-7 4-7 2-5 4-6, 9, 13-15, 18, 22, 27, 28 7-9, 14 2-6 2-7, 36 5-9, 11
<pre>Item 1(b)</pre>	
00145 00146 margin) 00147 00148 00149 00150 00151 00152 00153 00154	1-15 4-7, 9, 10, 12, 13, 16-18, Col. A (left 2, 4 5-9 4-7, 10, 17, 20, 21, Col. A (left margin) 4-7, 16, 28 2, 6, 8, 12, 14, 21, 22, 27, 28, 30 3, 4, 14, 16, 18 5-9, 11, 12 5, 6, 9, 11, 12

Item 1(b) cont.

- .

```
LINE NO.
PAGE
F01B10V00155
                        4-7, Col. A (left margin)
                                                                  - - - - - -
       00157
                        4-7, 13, 17, Col. A (left margin)
       00158
                        5-9, 11, 14, 15-24
       00159
                        4-7, Col. A (left margin)
       00160
                        5-9, 11
       00161
       00162
                        4-7, 10, 11, 14, 18, Col. A (left margin)
       00163
                        2, 5
       00164
                        5-11
                        4-8, 13, Col. A (left margin)
       00165
                        4-8, 14, 16, 17
       00166
       00167
                        4-8, 13
       00168
                        4-8, 11, 14, 16, 17, 20, 22, 27, 29, 34, 36
       00169
                        2-5, 12, 18
       00170
       00171
                        4-7, Col. A (left margin)
       00172
                        4-7, 10, 11, 15, 18, 22, 23, 27
                        1, 7
       00173
       00174
                        5-8, 11, 13, 16
       00175
                        4-7, Col. A (left margin)
       00177
                        5-8
       00178
                        1 - 4
       00179
                        8
                        22-28
       00180
       00181
                        8, 9
                        22 - 28
       00182
       00183
                        4-7, Col. A (left margin)
       00184
                        5-8
       00185
                        4-7, Col. A (left margin)
       00186
                        4-7, 10, 11, 21, 22
       00187
                        16
       00188
                        5-9
       00189
                        1 - 4
                        1-8, 15, 16, 18, 19
       00190
                        1-8, 12, 15-17
       00191
       00192
                        4-8, 10, 13, 15, 18, 21, 23, 25, 26, 29, 31,
                        32, Col. A (left margin)
                        4-6, 10, 16, 19, 23, 30, 31
       00193
       00194
                        5, 9, 11
                        5-9
       00195
       00196
                        4-8, 32, Col. A (left margin)
                        1-3, 5, 7-10, 14, 15
       00197
       00198
       00199
                        4-7, 10, 13-15, 17, 18, Col. A (left margin)
```

Attachment A Tubaugh 1/14/93 Deposition Page 6 of 7

Item 1(b) cont.

PAGE	LINE NO.	
F01B10V00200 00201 00202	4-7, 10, 11, 15-20, 22, 23, 26, 27, 30, 31-4, 7, 9-11, 15, 18, 19, 21, 23, 24, 31, 32, 7, 9-11, 14-16, 18, 20, 21, 25, 26, 29, 32	
00203	3, 6, 10, 11, 13, 15, 19, 20, 24, 27, 29, 31, 33, 34	
00204 00205 00206 00207 00208 00209 00210 00211 00212 00213 00214 00215 00216	3-6, 8 5-9, 11, 12 4-7, 13, 14, Col. A (left margin) 4-7 2, 4, 7, 23 5-8 1-4 1, 2, 23-28, 31 1, 2, 37 9-14 1, 2, 25-31 12, 24 1, 2, 30-35, 37	
<pre>Item 2(a)</pre>		
0000217 0000218 0000220 0000221 0000222 0000223 0000224 0000225 0000226 0000227 0000228 0000229 0000230 0000231 0000233 0000235 0000236 0000237	1-7 4-7 5, 7, 8 4-7, 9, 11, 16, 27, 32 3 2, 4, 5 4-8, 16, 20, 37 1, 5, 6 5-9, 17 4-7 5-8 4-7 5, 7, 8 4-7, 36 3-7 5-8 4-7 5-8, 13	

Attachment A Tubaugh 1/14/93 Deposition Page 7 of 7

Item 2(b)

PAGE	LINE NO.
F01B10V0000238 0000239 0000240 0000241 0000242 0000243 0000244 0000245 0000246 0000247 0000248	LINE NO. 1-6 4-7, Col. A (left margin) 5, 7, 8 4-7, Col. A (left margin) 4-7 5, 7, 8, 11 4-7, Col. A (left margin) 5, 7, 8 4-7, Col. A (left margin) 4-8 5-8 4-7, Col. A (left margin) 4-8 5, 7 1-4 2-6 9-13 34-36
	34-36 4-7, 18, Col. A (left margin) 5, 7, 8