

Southern Bell Telephone and Telegraph Company c/o Marshall M. Criser III Suite 400 150 So. Monroe Street Tallahassee, Florida 32301 Phone (305) 530-5558

July 26, 1993

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

920260-11

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

Dear Mr. Tribble:

J. Phillip Carver

General Attorney

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Notice of Intent to Request Specified Confidential Classification, which we ask that you file in the captioned docket. ACK .

AFA 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, Phillip Car

6 Enclosures

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

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CERTIFICATE OF SERVICE Docket No. 920260-TL Docket No. 910163-TL Docket No. 910727-TL Docket No. 900960-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this day of , 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, FL 32301-1838 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 Communications Co. Limited Partnership 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

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Michael B. Twomey Gerald B. Curington 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 Communications Florida Public Svc. Commission 101 East Gaines Street Tallahassee, FL 32399-0863



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Filed: July 26, 1993

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S NOTICE OF INTENT TO REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATION

COMES NOW BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), and pursuant to Rule 25-22.006, Florida Administrative Code, files its Notice of Intent to Request Specified Confidential Classification.

1. The Office of Public Counsel ("Public Counsel") issued a Notice of Deposition in the above-referenced docket in order to take the depositions of Southern Bell employees on June 29 and 30, 1993 in Miami, Florida. The depositions of the following employees who were deposed at the above-noted dates have been transcribed and were received by Southern Bell on July 23, 1993: Edward Lubert, George E. Nicholson, John Seiler, Wanda Brent, Eduardo Andrade, Raymond R. Kassim, Carmen L. Hernandez, Melanie Davis and Delhia Jane Koski.

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2. Some of the information contained in the depositions is proprietary. Included is information containing, among other things, employee names, home addresses, home phone numbers, and business addresses and telephone numbers. This information is clearly confidential and proprietary under Florida Statutes, Section 364.183(f), which provides that "proprietary confidential business information" includes "employee personnel information unrelated to compensation, duties, qualification, or responsibilities."

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3. The four areas of employee personnel information that are not, <u>per se</u>, confidential pursuant to Section 364.183(f), Florida Statues, are compensation duties, qualifications, and responsibilities of an employee. A common sense reading of this list demonstrates that the employee-specific information provided in response to the deposition questions do not fit any of the exceptions and thus are, <u>per se</u>, confidential under Section 364.183(f), Florida Statutes.

4. Because this information contains proprietary information, Southern Bell is filing this Notice of Intent to Request Specified Confidential Classification, pursuant to Rule 25-22.006(3)(a)(b)(5), Florida Administrative Code, in order to allow the Staff to take possession of the deposition transcripts without delay. The original of this notice has been filed with

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the Division of Records and Reporting, and a copy has been served on the Division requesting the information. Public Counsel's Notice of Deposition is attached hereto.

Respectfully submitted this 26th day of July, 1993.

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SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

HARRIS R. ANTHONY

HARRIS R. ANTHONY (24) J. PHILLIP CARVER c/o Marshall M. Criser, III 400 - 150 South Monroe Street Tallahassee, Florida 32301 (305) 530-5555

DOUGLAS LACKE

NANCY B. WHITE 4300 - 675 West Peachtree St. Atlanta, Georgia 30375 (404) 529-5387 . 1

ATTACHMENT

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition on behalf of CITIZENS) OF THE STATE OF FLORIDA to initiate) investigation into integrity of SOUTHERN) BELL TELEPHONE & TELEGRAPH COMPANY'S) repair service activities and reports.)

DOCKET NO. 910163-TL FILED: June 16, 1993

NOTICE OF DEPOSITION UPON ORAL EXAMINATION

TO: Harris R. Anthony, Esq. c/o Marshall M. Criser III BellSouth Telecommunications, Inc. d/b/a/ Southern Bell Telephone & Telegraph Company 150 S. Monroe Street Tallahassee, FL 32301

NOTICE is hereby given that, pursuant to Florida Rule of Civil Procedure 1.310(b)(6), the Citizens of Florida, by and through Jack Shreve, Public Counsel, will take the sworn depositions of the following BellSouth employees as shown on the attached schedule in Miami:

Eduardo Andrade, Ronald Bates, Wanda Brent, Bertha Brooks, Melanie Davis, Carmen Hernandez, Raymond Kassim, Delhia Koski, Edward Lubert, Kenneth Matthews, Kathleen Minus, John Seiler.

The depositions, which are for the purpose of discovery and such other purposes as are permitted by the Florida Rules of Civil Procedure, will cover the customer repair and rebate systems and any other matters related to the consolidated rate case docket 920260-TL.

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U.S. MAIL - REG. RELATIONS TALLAHASSEE, EU The depositions are scheduled at the following locations and

times indicated:

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Tuesday, June 29 - Wednesday, June 30, 1993, at 8:30 a.m. Southern Bell Telephone & Telegraph Company 666 N.W. 79th Avenue, Conference Room 674 Niami, Florida

Dated this 16th day of June 1993.

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Charles J. Beck Deputy Public Counsel

Office of Public Counsel c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, Florida 32399-1400

(904) 488-9330

Attorney for the Citizens of the State of Florida

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Miami-666 N.W. 79th Avenue, Conference Room 674

<u>June 29</u>

<u>June 30</u>

CERTIFICATE OF SERVICE DOCKET NO. 920260-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail or hand-delivery to the following parties on this 16th day of June, 1993.

Marshall Criser, III BellSouth Telecommunications, 150 S. Monroe St., Suite 400 Tallahassee, FL 32301

Harris B. Anthony BellSouth Telecommunications, 150 W. Flagler St., Suite 1910 Miami, FL 33130

Robin Norton Division of Communications Fla. Public Service Commission 101 East Gaines Street Tallahassee, FL 32301

Doug Lackey BellSouth Telecommunications, Inc. (Southern Bell Telephone & Telegraph Company) 4300 Southern Bell Center Atlanta, GA 30375

Mike Twomey Department of Legal Affairs Attorney General The Capitol Bldg., 16th Floor Tallahassee, FL 32399-1050

Laura L. Wilson Messer, Vickers, Caparello, Madsen & Lewis, P.A. P.O. Box 1876 Tallahassee, FL 32302-1876

Irshall Criser, IIITracy HatchIlSouth Telecommunications,Tracy HatchInc. (Southern Bell TelephoneJean Wilson& Telegraph Company)Division of Legal Services50 S. Monroe St., Suite 400Fla. Public Service Commissionallahassee, FL 32301101 East Gaines StreetTallahassee, FL 32301Tallahassee, FL 32301 ElectronyEdward PaschallInc. (Southern Bell TelephoneFlorida AARP Capital City Task& Telegraph Company)Force 1923 Atapha Nene Tallabassee, FL Tallahassee, FL 32301

> The American Association of Retired Persons c/o Bill L. Bryant, Jr. Foley & Lardner 215 S. Monroe St., Suite 450 P.O. Box 508 Tallahassee, FL 32302-0508

Richard D. Melson Hopping Parts Hopping, Boyd, Green & Sams 23 South Calhoun Street P.O. Box 6526 Tallahassee, FL 32314

Michael J. Henry MCI Telecommunications Corp. MCI Center Three Ravinia Drive Atlanta, GA 30346

Lance C. Norris, President Florida Pay Telephone Assn., Inc. 8130 Baymeadows Circle, West Suite 202 Jacksonville, FL 32256

Joseph A. McGolthlin Vicki Gordon Kaufman McWhirter, Grandoff & Reeves 315 S. Calhoun Street, Suite 716 Tallahassee, FL 32301

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Rick Wright AFAD Fla. Public Service Commission 101 East Gaines Street Tallahassee, FL 32301

Peter M. Dunbar Haben, Culpepper, Dunbar & French, P.A. 306 N. Monroe St. P.O. Box 10095 Tallahassee, FL 32301

Patrick K. Wiggins Wiggins & Villacorta, P.A. P.O. Drawer 1657 Tallahassee, FL 32302

Dan B. Hendrickson P.O. Box 1201 Tallahassee, FL 32302

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

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

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

Joseph P. Gillan J. P. Gillan and Associates P.O. Box 541038 Orlando, FL 32854-1038 C. Everett Boyd, Jr.

Ervin, Varn, Jacobs, Odom & Ervin 305 S. Gadsden Street P.O. Drawer 1170 Tallahassee, FL 32302

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, FL 32301

Florida Hotel and Motel Assn. c/o Thomas F. Woods Gatlin, Woods, Carlson & Cowdery 1709-D Mahan Drive Tallahassee, FL 32308

Douglas S. Metcalf Communications Consultants, Inc. P.O. Box 1148 Winter Park, FL 32790-1148

Benjamin H. Dickens, Jr. Blooston, Mordkofsky, Jackson & Dickens 2120 L Street., N.W. Washington, DC 20037

Floyd R. Self Messer, Vickers, Caparello, Lewis, Goldman & Metz, P.A. P.O. Box 1876 Tallahassee, FL 32302-1876

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Charles J. Beck Deputy Public Counsel