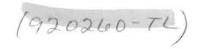
J. Phillip Carver General Attorney

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

August 18, 1993



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

Re: <u>Docket No. 910163-TL - Repair Service Investigation</u>

Dear Mr. Tribble:

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.

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.

J. Phillip Carver (2)

Enclosures

cc: All Parties of Record

A. M. Lombardo Harris R. Anthony R. Douglas Lackey

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H BOODON

A BELLSOUTH Company

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PSC-RECORDS/REPORTING

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 18th day of August , 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

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106 East College Avenue
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& Ervin
305 South Gadsen Street
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atty for Sprint

Florida Pay Telephone
Association, Inc.
c/o Mr. Lance C. Norris
President
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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 Gerald B. Curington Department of Legal Affairs Room 1603, The Capitol Tallahassee, FL 32399-1050

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Mr. Peter Q. Nyce, Jr.
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901 North Stuart Street
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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

J. Phillip Conver

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: August 18, 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 August 17, 1993: Kenneth R. Matthews, Kathleen Minus, Ronald Bates and Bertha Brooks.
- 2. Some of the information contained in the depositions is proprietary. Included is information containing, among other

DOCUMENT NUMBER-DATE

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FYSO-RECGROS/REPORTING

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."

- 3. The four areas of employee personnel information that are not, per se, 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, per se, 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 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 18th day of August, 1993.

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

HARRIS R. ANTHONY

J. PHILLIP CARVER

c/o Marshall M. Criser, III 400 - 150 South Monroe Street Tallahassee, Florida 32301 (305) 530-5555

R. DOUGLAS LACKEY

NANCY B. WHITE

4300 - 675 West Peachtree St.

Atlanta, Georgia 30375

(404) 529-5387

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.

The depositions are scheduled at the following locations and times indicated:

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 Miami, Florida

Dated this 16th day of June 1993.

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

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

	June 29	June 30
08:30 a.m.	Brooks, Bertha	Andrade, Eduardo
09:45 a.m.	Seiler, John	Hernandez, Carmen
11:00 a.m.	Minus, Kathleen	Kassim, Raymond
12:15 p.m.	Lunch	Lunch
01:15 p.m.	Bates, Ronald	Matthews, Kenneth
02:30 p.m.	Lubert, Edward	Koski, Delhia
03:45 p.m.	Brent, Wanda	Davis, Melanie

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, Inc. (Southern Bell Telephone & Telegraph Company) 150 S. Monroe St., Suite 400 Tallahassee, FL 32301

Harris B. Anthony ellSouth Telecommunications, Edward Paschall
Inc. (Southern Bell Telephone Florida AARP Capital City Task BellSouth Telecommunications, & Telegraph Company) 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

Angela Green Tracy Hatch Jean Wilson Division of Legal Services Fla. Public Service Commission 101 East Gaines Street Tallahassee, FL 32301

1923 Atapha Nene 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, 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

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.
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Office of the Judge Advocate
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106 East College Avenue
Suite 1410
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Charles J. Beck
Deputy Public Counsel