



STATE OF FLORIDA
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, Florida 32399-1400
904-488-9330

JACK SHREVE
PUBLIC COUNSEL

August 25, 1993

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

(920260-TL)

RE: Docket Nos. 910163-TL & 910727-TL

Dear Mr. Tribble:

Enclosed please find three copies of Public Counsel's Revised Notice of Deposition Upon Oral Examination, which we ask you to file in this docket. The original and one copy have been served on Southern Bell Telephone and Telegraph Company by mail on this date.

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.

- ACK [checked]
AFA
APP
CAF
CMU [checked]
CTR
EAG
LEG [checked]
LIN [checked]
OPC
RCH
SEC [checked]
WAS
QTH

Enclosures

cc: All Parties of Record

Sincerely yours,

[Signature of Janis Sue Richardson]
Janis Sue Richardson
Associate Public Counsel

DOCUMENT NUMBER-DATE
09181 AUG 25 83
FPSC-RECORDS/REPORTING

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) Docket No. 910163-TL
BELL TELEPHONE & TELEGRAPH COMPANY'S)
repair service activities and reports.)
_____)

In re: Investigation into Southern Bell) Docket No. 910727-TL
Telephone and Telegraph Company's)
Compliance with Rule 25-4.110(2)) Filed: August 25, 1993
(Rebates))
_____)

REVISED NOTICE OF DEPOSITION UPON ORAL EXAMINATION

TO: Harris R. Anthony, Esq.
c/o Marshall M. Criser III
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 deposition of BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company for purposes of discovery and such other purposes as are permitted by the Florida Rules of Civil Procedure. The deposition will cover the processing of the trouble reports and rebates attached as Attachments 1, 2, and 3 to Citizens' forty-second set of interrogatories and the documents produced in response to Citizens' forty-fourth and forty-fifth sets of production of documents.

The company is requested to produce employees with personal knowledge as to the rebates and the trouble reports involved in procedural matters involved in identifying the trouble reports to


be rebated and the manual processing of the rebates. Employees with knowledge of the trouble reporting and billing/rebating systems, including but not limited to LMOS (front end and back end) and MOOSA, and any changes to those systems related to these trouble reports and rebates, are requested to appear.

The employees, appearing on behalf of the company, are requested to bring to the deposition (see Citizens' forty-fifth production of documents request attached to the original notice) all documents necessary to respond to Public Counsel's questions on the trouble reports and rebates identified as attachments 1, 2, and 3 to Citizens' forty-second set of interrogatories. This includes but is not limited to BellSouth Practices for processing trouble reports and rebates, coding definitions for the trouble reports and rebate forms, copies of Attachments 1, 2, and 3 to Citizens' forty-second set of interrogatories, and any other documents necessary to fully respond to questions related to these reports and rebates. This revised notice incorporates by reference Citizens' forty-fifth document request. The only amendment to that request is the designated place of production. This is changed by incorporation in this notice to Southern Bell's offices in Miami.

The depositions are scheduled at the following location and
time:

Wednesday, September 8, 1993, 8:00 a.m. - 5:00 p.m.
Southern Bell Telephone & Telegraph Company
666 N.W. 79th Avenue, Room 627
Miami, Florida
Contact Person: Terry Gludovatz, 305 / 644-4002

Dated this 25th day of August 1993.


Janis Sue Richardson
Associate 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

**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 25th day of August, 1993.

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

Harris B. Anthony
BellSouth Telecommunications,
Inc. (Southern Bell Telephone
& 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
c/o Florida Cable Television
Association, Inc.
P.O. Box 10383
310 N. Monroe Street
Tallahassee, FL 32302

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

Edward Paschall
Florida AARP Capital City Task
Force
1923 Atapha Nene
Tallahassee, FL 32301

The American Association of
Retired Persons
c/o Donald L. Bell
104 E. Third Avenue
Tallahassee, FL 32303

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

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

Dan B. Hendrickson
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Tallahassee, FL 32302

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

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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

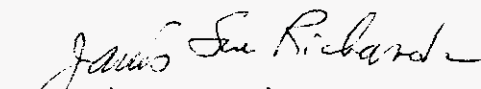
Michael W. Tye
AT&T Communications of the
Southern States, Inc.
106 East College Avenue
Suite 1410
Tallahassee, FL 32301

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


Janis Sue Richardson
Associate Public Counsel

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the)
Integrity of Southern Bell's) Docket No. 910163-TL
Repair Service Activities and) Date filed: August 4, 1993
Reports)
_____)

CITIZENS' FORTY-FIFTH SET OF REQUESTS FOR PRODUCTION
OF DOCUMENTS TO BELL SOUTH TELECOMMUNICATIONS, INC.

Pursuant to Section 350.0611(1), Fla. Stat. (1991), Rules 25-22.34 and 25.22.35, F.A.C., and Rule 1.350, F.R.C.P., Florida's Citizens' ("Citizens"), by and through Jack Shreve, Public Counsel, request BellSouth Telecommunications, Inc. ("BellSouth") d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell") to have the witnesses, who are designated by the company to appear at the deposition to be held at the following time and place:

Wednesday, September 8, 1993, 9:00 a.m.
Office of Public Counsel
111 West Madison Street, Room 812
Tallahassee, Florida 32399-1400

bring with them the following documents for use in the deposition and for inspection and copying at the Office of Public Counsel, Claude Pepper Building, 111 West Madison Street, Room 812, Tallahassee, Florida 32399-1400.

INSTRUCTIONS

1. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which privilege

is claimed, together with the following information: date, sender, recipients, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

2. If BellSouth has possession, custody, or control of the originals of the documents requested, please produce the originals or a complete copy of the originals and all copies which are different in any way from the original, whether by interlineation, receipt stamp or notation. If BellSouth does not have possession, custody, or control of the originals of the documents requested, please produce any copies in the possession, custody, or control, however made, of BellSouth.

3. Please construe "and" as well as "or" either disjunctively or conjunctively as necessary to bring within the scope of this production of documents any document which might otherwise be construed to be outside the scope.

4. If you object to any discovery requests, in whole or part, on the basis of confidentiality, please strictly follow the provisions of Florida Public Service Commission Rule 25-22.006 requiring a motion for a protective order no later than the date the response is otherwise due and urging all parties to seek mutual agreement before bringing a controversy to the Commission.

5. Unless otherwise indicated in the discovery request, only

documents created on or after January 1, 1987 are requested.

6. The Citizens specifically request the company to make a review of the files of employees reasonably expected to have information responsive to these document requests. Correspondence and notes of meetings, whether typed or handwritten, are specifically requested. If a particular employee is in charge of an area related to a document request, the Citizens request the company to search the files both of the employee in charge of the area as well as each employee reporting directly or indirectly to such person if their areas of responsibility also include matters reasonably likely to be responsive to the document request.

7. The Citizens specifically request the company to make a review of the files of employees reasonably expected to have information responsive to these document requests. Correspondence and notes of meetings, whether typed or handwritten, are specifically requested. If a particular employee is in charge of an area related to a document request, the Citizens request the company to search the files both of the employee in charge of the area as well as each employee reporting directly or indirectly to such person if their areas of responsibility also include matters reasonably likely to be responsive to the document request.

8. Please identify each document or set of documents produced in response to this request, by the number of the request.

For example; on a document produced for number 1 of the first request, write "responsive to Citizens' First Production of Document Request #1," or "1st POD #1."

9. For sets of documents, e.g. DLETHs or customer billing reports, numerical or alphabetical sequence, please include a description of the sequence or order of the documents and identify the individual or individuals who provided the information or helped in providing the information.

10. For documents produced especially off microfiche, please be sure that all copies are legible.

DEFINITIONS

1. "Document" or "documents" means any written, recorded, filmed or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device or any other media, including, but not limited to, memoranda, notes, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, and notes, any of which are in your possession, custody, or control.

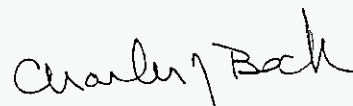
2. As used herein "you" and "your" means BellSouth Telecommunications, Inc., together with its officers, employees, consultants, agents, representatives, attorneys (unless privileged), and any other person or entity acting on behalf of BellSouth.

3. Words in the past tense include the present, and words in the present tense include the past. Use of the singular includes the plural, and use of the masculine includes the feminine where appropriate, and vice versa.

PRODUCTION OF DOCUMENTS

109. The trouble reports and rebates identified as attachments 1, 2, and 3, to Citizens' forty-second set of interrogatories and documents produced in response to Citizens' forty-fourth production of documents, served August 3, 1993. [This is simply a request to have the witnesses bring their own copies of these documents so that all persons present have a set of the same documents]

110. Please produce all documents necessary for the witnesses to answer questions regarding the trouble reports and rebates processed, which are identified in attachments 1, 2, and 3 of Citizens' forty-second set of interrogatories. This includes but is not limited to BellSouth Practices for processing and reading or interpreting trouble reports and rebate forms, and any other documents necessary to fully respond to questions related to these reports and rebates. For example, the witnesses should be prepared to define all code numbers and/or letters that appear on the trouble reports and rebate forms, identify the status (out-of-service or affecting service), whether the report was excluded, the amount and timing of any rebate, any causes for exemption from rebate, etc.


Charles J. Beck
Deputy Public Counsel