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September 17, 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.</u> ~~████~~ 900960-TL/kf 10/20/93   920260-TL

Dear Mr. Tribble:

    Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Request for Confidential Classification and Motion for Permanent Protective Order. Please file this document in the above-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 on the parties shown on the attached Certificate of Service.

            Sincerely,

            Nancy B. White

Enclosures

cc: All Parties of Record
    A. M. Lombardo
    H. R. Anthony
    R. D. Lackey

DOCUMENT NUMBER-DATE

10065 SEP 17 &

FPSC-RECORDS/REPORTING

I HEREBY CERTIFY that a copy of the foregoing has been

furnished by United States Mail this 17th day of September, 1993

to:

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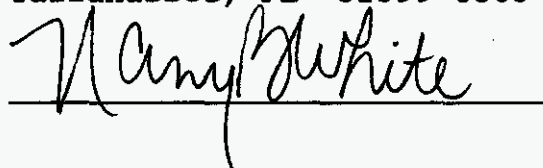P. O. Box 1148
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition on Behalf of   )
Citizens of the State of Florida   )
to Initiate Investigation into   )   Docket No. 910163-TL
Integrity of Southern Bell   )
Telephone and Telegraph Company's   )   Filed: September 17, 1993
Repair Service Activities and   )
Reports.   )
_____)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S REQUEST FOR CONFIDENTIAL CLASSIFICATION AND MOTION FOR PERMANENT PROTECTIVE ORDER

COMES NOW, BellSouth Telecommunications, Inc. d/b/a Southern

Bell Telephone and Telegraph Company ("Southern Bell" or

"Company"), and files pursuant to Rule 25-22.006, Florida

Administrative Division Code, its Request for Confidential

Classification and Motion for Permanent Protective Order for

certain information contained in documents produced in response

to Staff's Twenty-Fourth Request for Production of Documents

dated October 30, 1992 and Public Counsel's Thirty-First Request

for Production of Documents dated October 22, 1992.

1.   On October 30, 1992, Staff served its Twenty-Fourth

Request for Production of Documents on Southern Bell. Certain of

the documents, or portions thereof, sought by Staff contained

proprietary confidential business information.

2.   On August 27, 1993, Southern Bell filed its Notice of

Intent to Request Confidential Classification ("Notice") for

certain documents, or portions thereof, on the grounds that such

documents contained proprietary confidential business

information.

3.   On October 22, 1992, Public Counsel served its Thirty-

First Request for Production of Documents on Southern Bell.

Certain of the documents, or portions thereof sought by Public Counsel contained proprietary confidential business information.

4. On August 27, 1993, Southern Bell filed its Motion for Temporary Protective Order for certain documents, or portions thereof, on the grounds that such documents contained proprietary confidential business information.

5. Southern Bell is now filing its Request for Confidential Classification and Motion for Permanent Protective Order for documents or portions of documents produced for Staff which contain employee-specific information unrelated to compensation, duties, qualifications, or responsibilities, customer-specific account and billing information, and vendor-specific software-related information.

6. Southern Bell has appended to this Request for Confidential Classification and Motion for Permanent Protective Order as Attachment A a listing showing the location in the documents of the information designated by Southern Bell as confidential. Appended hereto in a package designated as Attachment B are two edited copies of the documents with the confidential information deleted. Attached as Attachment C is a sealed package containing copies of the documents with the material which is confidential and proprietary highlighted. Copies of Attachment C are not being served on the other parties in this proceeding.

7. With respect to the documents, or portions thereof, produced for Staff and Public Counsel and specifically referenced

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in Attachment A as containing employee-specific personnel information unrelated to compensation, duties, qualifications, or responsibilities, such information is specifically included in Section 264.183(3)(f), Florida Statutes, as proprietary confidential business information exempt from the public inspection and examination provisions of Section 119.07(1), Florida Statutes. These documents include records of personnel actions, procedures and investigations relating to employee activities that would fall outside normal and acceptable duties and responsibilities. In addition, these documents include home addresses, home telephone numbers and names of persons to contact in cases of emergency. Further, the documents do not relate to the employee's normal compensation or to any qualifications for employment. Consequently, these documents consist of employee information unrelated to normal compensation and qualifications or to the employee's defined duties and responsibilities.

8. The four areas of employee personnel information that are not, per se, confidential pursuant to Section 364.183(f), Florida Statutes, are compensation, duties, qualifications, and responsibilities of an employee. A common sense reading of this list, as well as a review of the definitions of these items as contained in Webster's Seventh New Collegiate Dictionary demonstrate that the names of employees who allegedly acted improperly do not fit any of these exceptions and are, therefore, entitled to confidential classification under Section 364.183(f), Florida Statutes.

9.   A review of these terms, in the context of Section 364.183(f), Florida Statutes, reveals their meaning. "Compensation" is the amount of money or other value that an employee is paid to perform his or her job duties. "Duties" are the particular acts an employee is expected to perform as a part of his or her job. "Qualifications" are the skills, knowledge, and abilities needed to perform a particular job. Finally, "responsibilities" are those things that an employee is obliged to do as part of his or her job. These meanings are confirmed by the dictionary definition of these words. Webster's definitions of these terms are as follow:

A.   Compensation - payment, wages.

B.   Duty - the action required by one's position or occupation.

C.   Qualification - something that qualifies; a condition that must be complied with.

D.   Responsibility - the quality or state of being responsible.

10.   Obviously, the allegation that a particular employee engaged in improper acts or has been investigated has nothing to do with the employee's qualifications or compensation. Likewise, these allegations are not related in a strict sense to the employee's responsibilities or with the particular employee's duties. Conceivably, these allegations of wrongdoing could relate to a very broad definition of the employee's responsibilities or duties. This interpretation, however, would require that "duties" or "responsibilities" be taken to describe not only the specific parameters of the employee's job, but also

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any act, whether authorized or not, that the employee does while on the job. Southern Bell asserts that this broad construction is inconsistent with both the exemption from public disclosure that is contained in Section 364.183(f) and the legislature's intended application of the public disclosure requirements of Chapter 119.

11. If this Commission were to interpret Section 364.183, Florida Statutes, to require public disclosure of any employee information that bears a relationship, even of an indirect or tangential nature, to an employee's job responsibilities, or duties, then there would be literally nothing protected from disclosure. Put another way, a broad reading of the exceptions to Section 364.183(f), Florida Statutes, would reduce the public disclosure exemption for employee information to the point of nonexistence. Obviously, if the legislature had intended for this statute to be read in a way that would make the employee information exemption uniformly unavailable and essentially pointless, then it would simply not have bothered to create the exemption in the first place. Therefore, the exceptions to Section 364.183(f) must be narrowly construed and applied. Consistent with this narrow application, the fact that an employee was investigated or disciplined because of allegations of wrongdoing must be viewed as outside of the scope of these employees' responsibilities and duties.

12. This narrow application of the exceptions to Section 364.183 is not only consistent with the normal rules of statutory

construction, its is supported by the express provisions of Chapter 119. Within the context of Section 119.14, (which is entitled "Periodic Legislative Review of Exemptions from Public Meetings and Public Records Requirements") there are listed particular factors that are to be considered by the legislature in determining whether the creation or maintenance of an exemption from public disclosure is appropriate. Subsection (4)(d)(2) states specifically that an identifiable public purpose that will justify the creation of an exemption exists when, among other things, the exemption in question, "protects information of a sensitive personal nature concerning individuals, the release of which information would be defamatory to such individuals or cause unwarranted damage to the good name or reputation to such individuals...." Section 119.14(4)(b)(2), Florida Statutes.[1]

13. Inasmuch as this docket has already resulted in widespread publicity as to Southern Bell, it is probable that the public disclosure of the identities and other personal information of these employees would also be widely published. This disclosure is unnecessary where, as here, the public will have access to all information relating to these allegedly improper acts, except for the names of the employees allegedly involved.

14. At the same time, the unnecessary public disclosure of

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[1] Although this subsection does not create an exemption from public disclosure, per se, it certainly provides insight into the legislative intent as to the proper application of existing exemptions, including Section 364.183(f).

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the names of employees who allegedly engaged in misconduct or were investigated would have the potential effect of subjecting them to public opprobrium and scorn at a point in this docket at which there has been no finding that any wrongful conduct actually occurred. In other words, on the basis of nothing more than unproven allegations, these particular employees would be publicly identified and subjected to public ridicule even though it may be subsequently determined that they did nothing wrong. Clearly, the public disclosure of the identities of these employees at this juncture and under these circumstances is antithetical to the legislative intent to apply chapter 119 in a way that will avoid the unwarranted disclosure of defamatory and damaging information of a personal nature.

15. This Commission should rule that the names, home telephone numbers, home addresses, and the names of emergency contacts for specific employees who allegedly engaged in or were investigated for some improper conduct should not be publicly disclosed because this disclosure would require an inappropriately broad construction of the four exceptions to the grant of confidentiality for personnel information that is set forth in Section 364.183(f), and because the disclosure of this information would have the probably effect of subjecting possibly innocent employees to public ridicule on the basis of nothing more than unproven allegations.

16. With respect to the documents, or portions thereof, produced for Staff and Public Counsel and specifically referenced

in Attachment A as including customer-specific network service information, this information is entitled to confidential classification on the basis that it is information relating to identifiable customers, including names, home telephone numbers, and home addresses. The Commission has always zealously protected customer-specific information from public disclosure in order to protect the customers' legitimate expectations of privacy and confidentiality of these records. Moreover, Section 119.07(3)(w), Florida Statutes, provides that documents supplied by a telecommunications company to a state agency, such as this Commission, which contain the names, addresses, and telephone numbers of subscribers are specifically exempt from the inspection and examination provisions of Section 119.07(1), Florida Statutes. Finally, to the extent that this information relates to the specific services provided by the Company to these customers is considered to be Customer Proprietary Network Information (CPNI), pursuant to existing federal and state CPNI rules, Southern Bell is restricted in the manner in which it discloses such information to other parties as well as to certain of its internal marketing personnel. Consequently, it would be anomalous if Southern Bell were compelled to publicly disclose information which it is otherwise restricted from disclosing pursuant to the existing CPNI rules.

17. With respect to the document produced for Staff and Public Counsel and specifically referenced in Attachment A as including vendor-specific software-related information, the

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information in this document is entitled to confidential classification on the basis that it reflects proprietary, vendor-specific software features and instructions regarding the proper use of the proprietary software purchased by Southern Bell from such vendor. If this information were to be publicly disclosed, a person possessing such information and gaining access to Southern Bell's LMOS System could improperly and detrimentally manipulate the system, causing damage of significant proportions to the system. Public disclosure of this information would also impair Southern Bell's future ability to contract for goods and/or services on favorable terms with its vendors, who would be hesitant or unwilling to provide this valuable information to Southern Bell if it were subject to public disclosure. Finally, in this case, Southern Bell has entered into a license agreement with its vendor providing for non-disclosure of the software-related information contained in the program application instruction manual in order to give assurances that the details regarding the vendor's software capabilities and other vendor-specific information are not publicly disclosed. Consequently, Sections 364.183(3) and (3)(d), Florida Statutes, both provide that this information, which is subject to a binding non-disclosure agreement, is specifically entitled to classification as proprietary confidential business information because the public disclosure of the information contained in the manual would harm Southern Bell's ability to negotiate future contracts with its vendors on favorable terms and would harm the Company's

business operations as described above.

18. Southern Bell has treated and intends to continue to treat the material for which confidential classification is sought as private, and this information has not been generally disclosed.

WHEREFORE, based on the foregoing, Southern Bell moves the Prehearing Officer to enter an order declaring the information described above and contained in the indicated portions of the attachments to be proprietary confidential business information, and thus not subject to public disclosure.

Respectfully submitted this 17th day of September, 1993.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY

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FPSC Docket 910163-TL
Southern Bell Telephone and Telegraph Company
Request for Confidential Classification
Documents Viewed and Selected at Adorno & Zeder
In Response to Staff's 24th and
Public Counsel's 31st Request for Production of Documents
Items 10,11,12

EXPLANATION FOR PROPRIETARY INFORMATION

1. This information is customer specific information that is exempt from the public disclosure requirements of Section 119.07 Florida Statutes under the express provisions of Section 119.07(w), Florida Statutes.

2. This information is employee personnel information unrelated to compensation, duties, qualifications or responsibilities. As such, this information is confidential business information pursuant to Section 364.183, Florida Statutues, and is exempt from the requirement of public disclosure of Section 119.07, Florida Statutes.

3. This information is vendor-specific software information and is governed by a License Agreement which provides that the information contained therein will not be released to the public. Also, public release of such vendor-specific proprietary information could impede Southern Bell's ability to contract for goods and services from vendor on favorable terms and conditions. Pursuant to Section 364.183(3) and (3)(d), Florida Statutes, this information is expressly deemed to be proprietary confidential business information exempt from the public examination and inspection provisions of Section 119.07(i), Florida Statutes.

FPSC Docket 900960-TL
Southern Bell Telephone and Telegraph Company
Request for Confidential Classification
Documents Viewed and Selected at Adorno & Zeder

LOCATION OF PROPRIETARY INFORMATION

Section #1
Bates Range C3 40001-40326

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40278	4,7		2
40279	3		2
40280	3-7 and photo i.d. top right corner		2
40281,282	4,6		2
40283	4,7,16		2
40284	3		2
40285	3-6 and photo i.d. top right corner		2
40286,287	4,6		2
40288	4,7,9		2
40289	3,5		2
40290	3		2
40291	3-7 and photo i.d. top right corner		2
40292	4,6		2
40293	4,7,9-13,18,21,25		2
40294	3,6,9,10		2
40295	3		2
40296,297	4,6		2
40298	4,7,13		2
40299	3		2
40300,301	4,6		2
40302	3,6,10		2
40303	10		2

Page	Line #	Column	Reason
40304	3		2
40305,306	4,6		2
40307	4,7,12		2
40308	3		2
40309,310	4,6		2
40311	4,6,14		2
40312	3		2
40313	1,5,8,12,24-27,29-21,26,40,44		2
40314	5,8,12,21,22,45,47,48,51		2
40315	1,8,10,11,13,14,19,21,28,31,37-39,45,49		2
40316	3,15,22,23,33,43,44-46,47,49		2
40317	3,4,6,7,9,12,19,22,24,26,28,34,43, 45,46,49,50		2
40318	1-4,6,13,14,24-29,32,34,35,37, 38,40,41,44-47,49-52		2
40319	1-3,6,7,9,11-13,17,23-32,36,39-41,44,47		2
40320	5-7,9,10,12,14,18,21-23,25-33,35		2
40321	2,3,5,9,13,15,19,21-23,26,29,37,39,43-46		2
40322	2,3,11-13,15,17-20,22-24,27,28,32,35 42,45,47		2
40324	3-5		2
40325,326	4,6		2

Section #2
Bates Range C3 10001-10059

Page	Line #	Column	Reason
10002	1,3,13,38		2
10003	1,7,11,12,14,17,18,20,21,23,26,27,29,31		2
10004	2,3,4,7,11,15,17-20,22,24,27,28,29,30,		
	31,32,34,37		2
10005	1,10,16,20,21,28-35		2
10006	3,12,18,22,23,31-35		2
10007	1,2,4-6,10,19,26,30,31		2
10008	5,6,10,13,18,27,32,36		2
10009	1,3-6,8,10,12,15,20,29,35		2
10010	3-7,9,17,26,32		2
10011	1,2,5,6,8,11,19,28,33		2
10012	2,3,9,18,28		2
10013	1,4		2
10014	1,6,10,12		2
10015	1,5,9-11		2
10016	1,5,6,11		2
10017	1,6,10-13,15,22,23		2
10018	3,8,11-13,18,30,35		2
10019	1,5,9-11,16,22,24,27-29,31		2
10019	27,31		1
10020	1,2,6-8,11,13,14,18,19,35		2
10020	6,18		1
10021	1,5,9-13,15		2
10021	19		1
10022	17		2
10023	1,5,9-12,15		2
10025	1,4,8,9,11,19,23,24		2
10026	5,11,14,18,19		2
10027	9,18,21,25		2
10028	8,17,20,24,27,35		2
10029	1,29,34		2
10030	3,7,8		2
10031	30,31		2
10032	4,8,20,24,25,28,37		2
10033	1,4,8,9,12,16,17,33,34		2
10034	2,10,14,26,28,31,35		2
10035	12,20,22,25,29,32		2
10036	6,19,25,28,32		2
10037	1,24,36		2
10038	5,14,17,21,22,25		2
10039	5,13,16,20		2
10040	14,30		2
10041	1,4,8,9,11,26		2
10042	5		2
10043	3,8,33,34		2
10044	2		2
10045	9-16		2
10046	1,10,14-16,21,22		2
10047	7,8,26,30		2
10048	3-6,8,25,32		2
10049	4,9-12		2
10050	5,14,20,24-27		2

Section #2
Bates Range C3 10001-10059
(cont'd)

Page	Line #	Column	Reason
10052	4,9,14,18,19,26,29,30		2
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10054	1,6,10-13,19,20,22-24,27		2
10055	4,29		2
10055	7,22		1
10056	1-4,9		2
10057	4		2
10058	4		2
10059	8		2

Page	Line #	Column	Reason
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20006	1,4,9,13,17,18,20,30,32,38,42		2
20007	6,7,9,11,16,31		2
20008	5,14,17,22-24,27,28		2
20009	5,6,10,12-15,18,20,30,33,38,39,45,46		2
20010	8,10-12,19,33,42		2
20011	1,5,9,10,14,17-21,24,30		2
20012	1,4,8,19,29,30		2
20013	1,4,5,7,10,11,15-18,24,30,38,42		2
20014	1,3,6,8,12,15,18,22,23,25,30,35,40-42		2
20015	1,5,8,14,32		2
20016	1,4,9,10,13,24,25,27		2
20017	5,15,18,25,29,35		2
20018	1,4,7,9,14,16,23,31		2
20019	3,8,9,18,23-25,29,33,34,37		2
20020	1,3-6,10,13,15-17,20,24,26,27,29-32,39		2
20021	3,7,8,12,13,17,26		2
20022	10,14,28		2
20023	3,7,8,12,18,20,22,23,24		2
20024	6,8,11,17,18,24-26		2
20025	1,14		2
20026	1,5,10,16,17,19-21,23,27-35		2
20027	1-4,6,16,21,24,28,29,31-36,39		2
20028	5,15,19,24,27		2
20029	2,3,10,12,14,16,18-21,33-35		2
20030	5,19,22,27,28		2
20031	4,14,21,28,29,34,36,40		2
20032	3,11,20,23,28,29,31		2
20033	4,11,19,22,26,27		2
20034	22,31,36-40,42,43,47		2
20035	35-37,39-42,44		2
20036	3,5,10,20,29,34		2
20037	3,8-11,24,25,28		2
20038	2,3,5,28,29,35,37-39		2
20039	3-5,16,22,25,30,31,33,34		2
20040	6,20,24,26,29,34		2
20041	1,4,10,11,20-22,24,35		2
20042	1,4,8,12,16,21,22		2
20043	1,4,15,19,22,24,30-32,35,41,42		2
20044	1,2,4,6,8,14,21,22,28,32,38		2
20045	1,4,8,9,11,15,19,20,22,26,27,30		2
20046	1,6,10,11,25,28,36		2
20047	1,4,9,10,12,19,25,26		2
20048	1-4,6,27,30-36		2
20049	1,4,8,12-14,27,29,34		2
20050	3,8,15,16,18,31,34		2

Page	Line #	Column	Reason
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20053	3,5,26,27,31,38		2
20054	1-3,5,10,17,20,27,28,30,32,34,36-38		2
20055	1,3,7,9,10,11,13,1719,23,25,27,29,32,34		2
20056	5,12,15,24,27,32,33,36,37,40		2
20057	4,5,8-10,12,14,23,25,26,28,31,37		2
20058	3,8,9,11,12,23,24,32,33		2
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20060	1,4,8,9,11		2
20061	1-4,10,11,24		2
20062	5,15,18,28,29		2
20063	10,11,13,14,22		2
20064	1,6,13,24,25,32-34,39		2
20065	15,17,24,31,33,36,39,41,42		2
20066	3,9,14,32-34,36,38		2
20067	16,21,22		2
20068	4,14,21,27		2
20069	30		2
20070	1,8,13,18,32,33		2
20071	3,4,6,7,10		2
20072	3,4,13,20,25,30		2
20073	11,21,25-27,32,42,43		2
20074	13,14,16,22,29		2
20075	1,7,10,23		2
20076	5,12,16,21,31,33,34		2
20077	2,20,27,29,36		2
20078	1,7,13,16,26		2
20079	7,14,19,24		2
20080	2,4,15-17,41		2
20081	2,8,14,17,27,33,36		2
20082	10,17,23,29,32		2
20083	6,7,9,10,19,25,27,38		2
20084	1,2,4,5,10-12,14,17,19,21,24,31,33,34		2
20085	1,7,12,29		2
20086	4,6,9,10-14,20,27,33		2
20087	3,30,37		2
20088	4,10,13		2
20089	14,23,28		2
20090	1,25-29,31-33,43,45		2
20091	8,15,21		2
20092	1,4,14,19,20,27,28,35,37,39,47		2
20093	6,13,18		2
20094	11,12,18,25,30		2
20095	3,6,14,29-34,41		2
20096	2,7,13,24		2
20097	1,4,6,10,11,13,14,17,40,46		2
20098	1,2,4,6,8,9,12,18,25,26,33		2

Page	Line #	Column	Reason
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20102	1,8,13		2
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20105	3,11,17,17,20,27,28,31,32,43		2
20106	7,12,31		2
20107	3,11,23,30		2
20108	1,6,19-22,24,32,36,37,39,43		2
20109	4,11,16,21,32-34		2
20110	4,11,12,17,33,35,39,40,42,42		2
20111	1,9,14,19,30-32		2
20112	3,15,20,22,23,26,36,45		2
20113	9,14,21,26,31		2
20114	5,8,9,18,25		2
20115	2,9,16,21,27		2
20116	3,4,34		2
20117	1,6,11,22		2
20118	1,4,16,30,38		2
20119	4,12,13,20,25,27,32,36,37,41		2
20120	6,11,27,28,34		2
20121	2,3,5,6,9,10,12,16,30,37		2
20122	1,6,12,21-23,30,31,33		2
20123	3,4,7,10,11,22,26,33		2
20124	3,8		2
20125	6,13,18,24,33		2
20126	1,11,35,37,38,46		2
20127	6,8,14,20,28,30,33-36		2
20128	8-10,12,29,31,36-38,44,45		2
20129	2,15,22		2
20130	4,9,20		2
20131	3,4,11,39		2
20132	20		2
20133	1,6,12,21,23,24,35		2
20134	7,8,11,23,28,32,36		2
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20141	1,8,13		2
20142	1,16,24,27,34,38		2
20143	8,15,20,26,27		2
20144	10,19,28,31,43		2
20145	5,10,14		2
20146	4,5,14,21		2
20147	4,9		2

Page	Line #	Column	Reason
20148	35,42		2
20149	4,10,23		2
20150	4,9,16,21,28		2
20151	9,13,14		2
20152	9,16,18,24		2
20153	6,16,17,20,21,26,31		2
20154	25,33,38,44		2
20155	9,10,14,18,22-24,26,30,33,34,37,39,41 45,46,51,52,55		2
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20157	4,6,9,12,15,20,21,23,25, 30,32,33,36,38,44,51		2
20158	4,10,11,20,23,32		2
20159	6-9,19		2
20160	3,9,27,28,34,39,40,48,50		2
20161	2,9,14,43,45,46		2
20162	8,10,21,28,33,39		2
20163	6-8,11,31		2
20164	1,5,10		2
20165	1,7,11		2
20166	10,20,24,29		2
20167	2,9,12,17,36		2
20168	1,5,36,43		2
20169	5,36		2
20170	1,7,12,29-31,33,35		2
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20173	6,28		2
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20175	1-5,8		2
20176	1,2,11,18,23,28		2
20177	9,19,23-25,30,40,41		2
20178	11,12,14,20,27,33		2
20179	5,8,20,40		2
20180	4,11,16,21,32-34		2
20181	1,19,20,22,26,28,35		2
20182	1,7,13,16,26		2
20183	5,12,17,22		2
20184	1,3,14-16,40		2
20185	1,7,13,26,35		2
20186	9,16,22,28,31		2
20187	5,6,8,9,18,24,26,37,47		2
20188	1,3,4,9-11,13,16,18,20,23,30,32,34-36,38		2
20189	1,2,7,13,18,35,39		2
20190	3,6,8-11,17,24,30		2
20191	2,7,29,36		2
20192	4,10,13,36		2
20193	13,20,25,31		2

Page	Line #	Column	Reason
20194	23-26,28,30,31,42,44		2
20195	7,14,20,26		2
20196	3,13,18,26,27,34,36,38,41-43		2
20197	1,4,11,16		2
20198	4,10,11,17,24,29		2
20199	2,13,28-30,32,40		2
20200	1,6,12,23,36		2
20201	3,5,9,10,12,13,16,40,45,47		2
20202	1,3,5,7,8,11,17,24,25,32		2
20203	1,7,12,29,34-36		2
20204	40,42,43,45,46		2
20205	15,16,19,20-22,28,35		2
20206	4,10		2
20207	40,42,44		2
20208	1-3,5,7,11,14,23,30,31,33,40,41,44,45		2
20209	10,17,22		2
20210	7,14,22,34		2
20211	1,6,11,24-27,37,41		2
20212	1,3,7,10,11,15,22,27,32		2
20213	9-11,15,22,23,28,44,46		2
20214	3,4,6,8,11,19,24,29		2
20215	6-8,14,26,33331,33,34,37,47		2
20216	9,20,25,32		2
20217	1,6,15,18,19,27,28,37		2
20218	13,20,29,34		2
20219	5,14,15,24		2
20220	1,8,13,18,29,30,33		2
20221	8,22,29		2
20222	9,10,17,22,24,28,29,31,33,34,37		2
20223	1,6,22,23,29,32,33,35,36		2
20224	2,3,5,9,23,30,37		2
20225	4,10,19-21,28,29,31,38,39,42		2
20226	3,4,15,19,26,31		2
20227	2		2
20228	1,8,13,19,28,29		2
20229	4,28,30,31,39		2
20230	1,6,12,20,22,25-28		2
20231	1-3,5,22,24,29-31,37,38,42		2
20232	8,15,20,25		2
20233	2,26,27,34		2
20234	15,43		2
20235	5,10,16,25,27,28		2
20236	3,13,14,17,29,34,38,42		2
20238	11,18,23,28		2
20239	8,21,22,27,30,32,37,39,43		2
20240	10,17,22,28		2
20241	4,5,47		2
20242	13,14,16,17,19-22,24,29,31,32,36		2

Section #2
Bates Range C3 20001-20418

Page	Line #	Column	Reason
20243	1,6,12,27,36,39		2
20244	5,9,25,32		2
20245	4,10,11,26,35,43,44		2
20246	13,20,25,29		2
20247	21,22,31,38		2
20248	4,9		2
20249	35,42		2
20250	4,10,23		2
20251	4,9		2
20252	1,6,13,14		2
20253	4,5,27,30		2
20253	14,15,25,26		1
20254	2,3		1
20254	1,4,6,11-14		2
20255	1,8,10,12,18,21,29,30,33,35		2
20255	13,14,16,19,23,24,26,28,31-36		1
20256	4,11,12,14,22,26		2
20257	1,10,17,20,29,35		2
20257	22-26,30,31		1
20258	1,6,14		2
20259	1,23,25,27,29,33		2
20260	12,22,27		2
20261	7,8		2
20261	14,20,28,29,34,35		1
20262	9,10,13,17,18,20,23-30,33,36,39,40,42,43		1
20263	2,4,5,6,9,10		1
20263	12,27		2
20264	1,6		2
20265	4,22,25-27,42,43,47,48		2
20266	1,4,9,10,12-14,17,19,21,28,35,39		2
20267	1,2,6-9,14,18,25,29,35		2
20268	5-8,10-12,15,21,23-26,28,29,33-36		
	38-40,42-44,47		2
20269	2-4,18,25,31,3207		2
20270	7,9,10,11,14,17,19,22-24,26,31-34,47-49		2
20271	2,3,6,13,20,26,34		2
20272	12,16,17,19,23,25-30,33,38		2
20273	1,5,10,12-15,17,19,22,25,26,34		2
20274	1,5,8,9,11,14,18,20,21,23-25,34		2
20275	1,5,11,13,14,16,18,20,29,36		2
20276	3,8-11,13,17,23,30,34,40		2
20277	3,5,7,9-11,13,18,25,29,35,37-39,41		2
20278	1,3,6,13,20,24,30,32-34,38		2
20279	5,12,16,21,22,29,30,32-35		2
20280	1,8,13,19,31		2
20281	4,11,12,15,22,27,33		2
20282	3,9,21,24,29,32,34,37,40		2
20283	1,6,12,23,25,27,30,35,41		2

Page	Line #	Column	Reason
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20286	5,9,10,14,16,17,21-25,29,39,48		2
20287	4,23,30,34		2
20288	1,3-8,10,13,15-17,19,22,24,26,28,30,31,35		2
20289	1,5,8-10,12		2
20290	7,16,22,24,26,29-33,35-38,40,42,43		2
20291	1,4,8,12,13,17,18,20,22,25,32,36,39		2
20292	1,14,21		2
20293	1,7,11-14,16,18-20,24-27,29,32-34,39,40 43-45		2
20294	1-3,10,17,19,30		2
20295	3,6-8,11,13,14,18-20,22,24,26,29,38		2
20296	1,3-8,11,13,14,16,23,28,33,43		2
20297	9,12-14,16,24		2
20298	1,3,5,6,9		2
20299	1,4,5,7,8,31,36,37		2
20300	8,15,20,25-28,33		2
20301	9,13,27,28,35		2
20302	1,8,12,17,18,20,22,24		2
20303	10,14,21,26,30-33,36,37		2
20304	1,5,7,9,10,18,22,23,25,34,41		2
20305	5,10,12,13,29,39		2
20306	7,16,23,30,32,33,35,37		2
20307	4,7,8,11,14,15,18-20,22,24-26		2
20308	1,6,11-13,23,24,31,33		2
20309	1,2,5-9,11,18,20,21,24,27-29,31-33,38,40,43		2
20310	1,8,12,15,16,18,19,28,30-34		2
20311	1-4,10,12-14,16,18,25-28,33,37,38,40,42		2
20312	5,12,18,28-31,35,36		2
20313	1-3,5,6,8,10,12,20,22,24,25,32,39		2
20314	3,7,10,16,22,24,36,38		2
20315	17,19-24,35,37,38,40,44,45		2
20316	10,11,14,24,28		2
20317	4-8,13,26,33		2
20318	2,5-7,9,11-13,18,24,31,35		2
20319	4,10,11,13,25,27,33,38,39,43-45		2
20320	2,3,5,9-11,18,24,28,32-34,36		2
20321	2-4,7,18,21,22,24,25,27,28,33,34,40		2
20322	12-16,18,19,21,24-26,31,32,35		2
20323	4,6,10-13,15,20,24,31,35		2
20324	3-6,11,28-34,37,43		2
20325	4,7-9,11,17,27,28,31-35		2
20326	4		2
20327	2,4,5,15,22,26		2
20328	1,2,4-7,14,22,23,26-30,32-35,38,39,41		2
20329	2,9,14,20,21,32,33		2
20330	3,4,9,24-26,34,41		2

Section #2
Bates Range C3 20001-20418

Page	Line #	Column	Reason
20331	3,6-9,16,18,19,25,26,30,33,36-38,40-42		2
20332	1,2,6,7,9,17,24,29,32,33		2
20333	8,17,19,23,29,37		2
20334	3,6-9,14,21-23,25,26,30,33,34,37,43		2
20335	7,11		2
20336	3,4,9,10,14,15,17,26,30,32,34,36,42,45		2
20337	2,13,15,19-21,34,42		2
20338	4,10-12,14,16,17,19,21,24-29,32,35,36,37,20 39,41		2
20339	4,11,15,2021,23,25,29-33,35		2
20340	1,5,8,10,20,17		2
20341	2,13-15,17,19,25,27,30,31,36,37,43,45		2
20342	4,10		2
20343	1,5,8,9,12,25-30		2
20344	5,8,13,21,23,27,37,38		2
20345	14,16,17,20,21,28,31,33,34,38,39,41		2
20346	1,4,10-12,18,22,26,27,39,45,46		2
20347	9,19-23,25,26,29,30,32,33,35,38,45		2
20348	1,3,5,7,13,22,24,26,28-31,34,41,42		2
20349	3,5-10,13,15,16,18,19,21,22,25,26,28-33 35-37,40,41,43,45,46		2
20350	1,5,11,13-16,18,20,23,27,29,31,35,39-42 44,47		2
20351	1,2,6,9-11,13,14,16-18,20,21, 23,37,38,41,44		2
20352	2,4,10,12,14,15,17,25,27,31-34,37,38,46		2
20353	1,4,6-8,10-13,115,17,20,21,24,31,34,36,43		2
20354	11,17-23,26,2,7		2
20355	2,5,13		2
20356	1-7,17,19-21,23,27		2
20357	9,10,19,26		2
20358	7,9,10,16		2
20359	10,12,21,25,26		2
20360	1,2,4,10,12,15,18,19,23,25,26		2
20361	11,14-16,20,21,24,25		2
20362	1,2,11,17,18,21,24		2
20363	1,2,7,8,15,16,19-24,26		2
20364	8,11,13,14,16,18,19,21		2
20365	3,12,24-27		2
20366	2-5,10,15,20		2
20368	12,16-21		2
20369	5,6,24		2
20370	8,9,14,17-22.24-26		2
20371	8,9,11,23		2
20372	8,12-15,17,18,22,26		2
20373	1,6,9,12,15,18,21		2
20374	14,16,17,23		2
20375	2,3,7,14,16-20.25-28		2

Section #2
Bates Range C3 20001-20418

Page	Line #	Column	Reason
20376	1,2,4,6,7		2
20377,378	1-26		2
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20382	4		1
20383	5,9,12-14,17,24,30,33,34,36		2
20384	23,24,39,41		2
20385	2,8,9,13,23,30,32		2
20386	2-5,7-10,12-15,21,29,31,32,34-36,39-41		2
20387	3,10,14,15,17-19,22,36-38		2
20388	3,4,6,9,20,22,24,26,28,31,32,37,43,45,47		2
20389	1-13,18,20-22,24,25,27,29,34-37,41,42,44,47		2
20390	1,2,5,7,10,12-14,16,18-21,23,27,34		2
20391	1,4,5,18,31-33,37,40,44,45		2
20392	1,3-5,8,9,12,18,20,22,23,26,28,30,31 34-36,38,42-45		2
20393	6,7,19,26,27,31,33,40		2
20394	3,7,10,11,28,29,33,34		2
20395	1,3,16,17,19,20,24,25,28-31,45		2
20396	7,11,14,15,32,33,36		2
20397	8,10,11,15,23-25,32		2
20398	1,3,6,9,10		2
20399	1,4,6,8,11,16,18-20,23,24,26		2
20400	9,12,14-17,19,21,26		2
20401	3,7,10,19,22,24,28		2
20402	1,4,6,7,10-12,17,20,24,27,28		2
20403	1,19		2
20404	10		2
20405	3,7,8,11,12,22		2
20406	4,6,7,8,10		2
20407	23		2
20408	17		2
20409	3		2
20410	3		2
20411	3		2
20412	1,2		2
20413	1		2
20414	4-8,10,11,12		2
20415	2		2
20416	1		2
20417	5-9		2
20418	5		2

Section #3
Bates Range C3 30001-30055

Page	Line #	Column	Reason
30001	3		2
30002	5,9-12,15		2
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30003	29		2
30004,30005	4,6		2
30006	4,7,11		2
30007	3		2
30008	1,6,10-12		2
30009	1,5,6,11		2
30010,30011	4,6		2
30012	4		2
30013	10		2
30015	3		2
30016	1,4,5,10,14,15,17,20,21,23,24,26,29,32,34		2
30017	2,4,5,7,11,15,17-20,22,23,26-29,31,34-36		2
30018	1		2
30019	1-5 and photo i.d.		2
30020	1		2
30021	3		2
30022	1		2
30023	4		2
30024,30025	4,6		2
30026	3		2
30027	1,5,9-13,15		2
30028	17		2
30029,30030	4,6		2
30031	4,5,9		2
30032	3		2
30033	1,3,10		2
30034	2,3,9,18,28		2
30035	2-6		2
30036	3		2
30037	1		2
30038	3		2
30039-30041	4,6		2
30042	3		2
30043	1,2,5,10,14-16,20-22		2
30044	8		2
30045,30046	4,6		2
30047	4,7,11		2
30048	10		2
30050	3		2
30051	1,5,9-12,15		2
30052	5,14,15		2
30053,30054	4,6		2
30055	4,10		2

Section #4
Miscellaneous Bates Ranges

Page	Line #	Column	Reason
C 1000441-446	DLETHs customer information redacted		N/P
C 1000447-466	Employee name highlighted, but not proprietary, as SS# is redacted		N/P
C 1000467-485	5,8,9		2
C 1001119-1121	DLETHs customer information redacted		N/P
C 1001122-1123	Employee name highlighted, but not proprietary, as SS# is redacted		N/P
C 1001124	1,2		1
C 1001125-1128	Employee name highlighted, but not proprietary, as SS# is redacted		N/P
C 1001129-1130	1,2		1
C 1001131	5,8,9		2
C 1001132-1135	5,8,9,15,18,19		2
C 1001136,1001137	5,8,9		2

Sections #5-8
Miscellaneous Bates Ranges

Page	Line #	Column	Reason
C920 000000	7-12,19,20,22,27		2
C920 000001	3,4,13,14-16,19,21-23,26,28-30,33		2
C920 000002	2-4,15,17-21,23,28,32-35		2
C920 000003	12,15,18,24,38-41,43,45,49,50,53		2
C920 000004	2,9,11-13,15,22,31,44		2
C920 000005	12,15,16,21,25-27,33,35,41,43		2
C920 000006	7,14,16,21,25-28,38-41,45		2
C920 000007	10,12,19,28,31,36,40-42		2
C920 000008	5,9,13-15,17,20-24,27,31,40		2
C920 000009	2,5,11,15-18,30		2
C920 000010	5,8,13,22,24,28,31,33		2
C920 000011	6-8,11,13,14		2
C921 000000	9-15,19,21-23,26,29,30,34		2
C921 000001	3,4,8-10,15,16,18,20,21,23,25,26,30-36		2
C921 000002	10,15,18,20,24-26,29,32,34-36,39,40		2
C921 000003	1,2,4,10,11,14-16,24,25,30,36		2
C921 000004	1,3,7,8,13,18,19,22,25,26,31		2
C921 000005	2,3,14,33		2
C921 000006	6,17,18,21-23		2
C921 000007	5,11,14,17,20,21,24,29,31,32		2
C921 000008	1,2,4,5,10,15-17,19,23,37		2
C921 000009	9,13,16,19,25,28,34,39		2
C921 000010	8,11,15,18,30,31,39,41		2
C921 000011	2,7,20,21,24,26		2
C921 000012	1,2,5,8,10-12,17,21,22,25,28,31,32,34		2
C921 000013	1,3,6,9,18,24,34,35,38,39		2
C921 000014	1,5,6,8,9,14,19-21,23,26,27		2
C921 000015	14,15,18-20,24,25,28,31,32		2
C921 000016	1,5,6,8,11,32,33,35		2
C921 000017	12,21,22,25-27		2
C921 000018	9,14,15,20,25-27		2
C921 000019	2,3,8,25,31		2
C921 000020	1,2,5-7,112,20		2
C921 000021	1,2,7,12-14,17,22,24,26		2
C921 000022	4,5,1224,26-29,31,34		2
C921 000023	4-6,9,23,26,30,31		2
C921 000024	5,17,26,29,32,33,36		2
C921 000025	1,5,7,8,10,19		2
C921 000025	11-13,18,21,23,24,25,27,28,30,32		1
C921 000026	1-5,14,29		1
C921 000027	2,3,8-12,26		1
C921 000028	5,11-13,19,36		1
C921 000028	10,24,25,29		2
C921 000029	1,3,7-11,19,21		1
C921 000030	5,11,12,15,17,22-24,26,29,31,34,35		1
C921 000031	1,3,9,12,14,17,22,29-32,39		1
C921 000032	1-4,8,11,16-19,24,27,29,31,33,37-40		1
C921 000033	15,24,32		1

Page	Line #	Column	Reason
C921 000034	1-4,7,8,11,12,14,19-22,29-31,36-39		1
C921 000035	4,10-17,30		1
C921 000035	18,19,22-24,27-29,33		2
C921 000036	3,7,8,10		2
C921 000036	13-17,23,26,32,37		1
C921 000037	4,10,15,16,22		2
C921 000037	12		1
C921 000038	12		2
C921 000039	1,3,4,6,7		2
C921 000040	2-8,10,14,16,17,19,23,25,27-30,32,35,37-40		2
C921 000041	1,2,4,6,8,9,10,12,15,16		2
C921 000060	5,10,11,15,16,18		2
C922 000000	1,4,6,8		2
C922 000001	1,4,5,6		2
C922 000002	8,11,12,15,17,18		2
C922 000004	2-7,9		2
C922 000005	2,10,19		2
C922 000006	1-2,6-9,11,13-17,19		2
C922 000008	11,12,15		2
C922 000009	12,13,16		2
C922 000013	2,3,7,11,12,14,22,26,27		2
C922 000014	5,10,11,15,19,20		2
C922 000015	9,18,19,23,27		2
C922 000016	8,17,18,22,26,37		2
C922 000017	1,29,35,36		2
C922 000018	3,7,8		2
C922 000019	30,31		2
C922 000020	4,8,13,19,23,24,27,29,36		2
C922 000021	1,2,6,10,11,14,18,19,34,35		2
C922 000022	2,10,14,26,28,29,33,37		2
C922 000023	12,19,21,22,26,30,33		2
C922 000024	6,18,24,25,29,33		2
C922 000025	1,24		2
C922 000026	5,14,15,19,23,24,27		2
C922 000027	5,11,12,16,20		2
C922 000028	14,30		2
C922 000029	1,2,6,10,11,13,27		2
C922 000030	5,23-31,32,33		2
C922 000031	3,8,32,33		2
C922 000032	2		2
C923 000000	3,8,9,11,15,16,18,22,23		2
C923 000001	4,6-8,12,15,16		2
C923 000002	3,4,7,16,18,20-24,31		2
C923 000003	1,3,6,9,12,15,19,23-28,32,35,42		2
C923 000004	11,12,15,17,22,23,27-29,32-35,38-43,45		2
C923 000005	2-5,6,8,10,11,13,14,18-21,25,26,28-33,35-37		2
C923 000006	2,5,8		2

Sections #5-8
Miscellaneous Bates Ranges
(cont'd)

Page	Line #	Column	Reason
C923 000008	3,36,37		2
C923 000009	6		2
C923 000010	14,16,17		2

Section #10
Bates Range C74 000137-000488s

Page	Line #	Column	Reason
C74 000137-000188		"BDAY"	2
C74 000240-000488		"BDAY"	2

Sections #11-12
Bates Range C74 000000-000135

Page	Line #	Column	Reason
C74 000000-000135	4,6		2

Sections #13-20
Miscellaneous Bates Ranges

Page	Line #	Column	Reason
C7 7000000	4-7		2
C7 7000004-6	4,6		2

LMOS DOCUMENTATION

Page	Line #	Column	Reason
C 6000017-64	ALL		3
C 6000102-195	ALL		3
C 6000217-230	ALL		3
C 6000261-279	ALL		3