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904 222-1201

March 25, 1994

ORIGINAL  
FILED

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

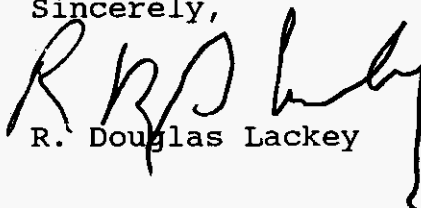
RE: Docket No. 920260-TL, 900960-TL, 910163-TL, 910727-TL

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Notice of Intent to 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.

Sincerely,

  
R. Douglas Lackey

ACK 2

AFA 1

APP \_\_\_\_\_

CFE \_\_\_\_\_

CMU \_\_\_\_\_

Enclosures

CTR cc: All Parties of Record

A. M. Lombardo

ENG \_\_\_\_\_ H. R. Anthony

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DOCUMENT NUMBER-DATE

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**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 25th day of March 1994 to:

Robin Norton  
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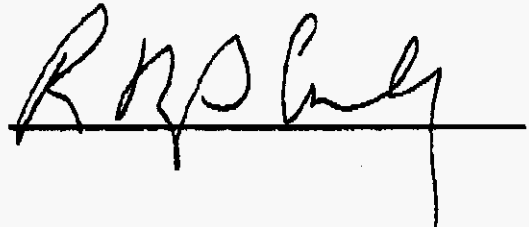
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Florida Public Svc. Commission  
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of  
the Revenue Requirements and Rate  
Stabilization Plan of Southern  
Bell Telephone and Telegraph  
Company

) Docket No. 920260-TL  
)  
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)  
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In re: Show cause proceeding  
against Southern Bell Telephone  
and Telegraph Company for  
misbilling customers

) Docket No. 900960-TL  
)  
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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  
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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  
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)  
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) Filed: March 25, 1994  
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**SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S NOTICE  
OF INTENT TO REQUEST 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  
Confidential Classification.

1. On March 10, 1994, the Supreme Court of Florida issued  
opinions<sup>1</sup> addressing the five appeals<sup>2</sup> filed by Southern Bell  
arising out of discovery disputes in the Florida consolidated

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<sup>1</sup> Supreme Court Case Nos. 81,487, 81,716, 81,926  
and 82,196.

<sup>2</sup> Four of these cases were consolidated by the Court for  
opinion and the fifth case was dismissed since the issues were  
all addressed in the consolidated opinion.

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rate case proceeding. The Court therein ordered Southern Bell to produce five internal audits and certain disciplinary panel recommendations.

2. The documents to be produced are clearly proprietary. For example, the documents include, among other things, internal audits, information derived directly from internal audits, employee personnel information unrelated to compensation, duties and responsibilities and other proprietary business information that, if disclosed publicly, would prove harmful to Southern Bell. Such information is specifically considered to be proprietary, confidential business information pursuant to § 364.183(3), (3)(b) and (3)(f), Florida Statutes.

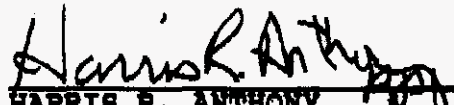
3. Consequently, because these documents contain proprietary information, Southern Bell is filing this Notice of Intent to Request Confidential Classification, pursuant to Rule 25-22.006(3)(a), Florida Administrative Code. The original of this notice has been filed with the Division of Records and Reporting, and a copy has been served on the Division requesting the information.


4. In addition to the aforementioned information, the Commission continues to hold material which the Supreme Court has determined to be either privileged, or subject to the work-product doctrine, or both. Obviously such materials are not subject to public disclosure. However, it appears that certain of the Commission's staff may intend to assert that portions of the material which is privileged, or subject to the work-product

doctrine, or both should be treated as if it were not. Pending resolution of this dispute, the Company asserts that all of this material must be treated as proprietary and confidential business information and herewith notices its intent to request confidential classification for this material within the time allowed by the Commission's Rules.

Respectfully submitted this 25th day of March, 1994.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY

  
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