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March 8, 1993

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

Re: Docket Nos. 920260-TL, 910163-TL, 910727-TL
and 900960-TL

Dear Mr. Tribble:

Enclosed for filing in the above-referenced docket, please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Notice of Intent to Request Specified Confidential Classification.

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,

Harris R. Anthony
Harris R. Anthony
(ea)

ACK _____
AFA 1 _____
APP _____
CAF _____
CMI 1 _____
CTR _____
EAG HRA:jn
LE3 Enclosure
LIT 1 bcc: Mr. A. M. Lombardo
OP3 Mr. R. D. Lackey
RC4 Parties of Record
SEC 1 _____
WAS _____
OTH Lee det _____
Kay Jan

RECEIVED & FILED
DIVISION OF RECORDS & REPORTING

DOCUMENT NUMBER-DATE

02601 MAR-83

FPSC-RECORDS/REPORTING

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 *8th* day of *March*, 1993
to:

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Florida Public Service
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Harris R. Anthony
J.R.

2.

Some of the information contained in these statements may be proprietary. Southern Bell has not been able to review the statements delivered to Staff by the Attorney General as of this filing. Indeed, when Southern Bell earlier requested some of these statements from the Attorney General, the Attorney General's representative refused to provide these documents to the Company. Thus, although Southern Bell believes some of the information contained therein may be proprietary information under Section 364.183, Florida Statutes, it cannot make that assertion with certainty. For example, information such as employee social security numbers have consistently been held by this Commission to be confidential. Southern Bell should be provided the opportunity to review these statements for this type of information before these statements are disclosed to the public.

3.

In any event, the statements were provided to the Attorney General and his Staff as part of their investigation of Southern Bell's sales and trouble reporting practices. The Attorney General's staff has released these statements which Southern Bell believes comprise some but not all of the Attorney General's investigative materials. Southern Bell further believes that under Section 119.07(3)(d), Florida Statutes, the Attorney General should not release some but not all of this investigative material. If his investigation is no longer active, the exemption found in Section 119.07(3)(d) no longer applies and all investigative information is

subject to public disclosure. In fairness, the total investigation should be disclosed to the public.

4.

For the reasons set forth above, 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. 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. The list of witness statements provided by the Attorney General is attached hereto.

Respectfully submitted this 8th day of March, 1993.

ATTORNEYS FOR SOUTHERN BELL
TELEPHONE AND TELEGRAPH COMPANY

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Attachment

M E M O R A N D U M

TO: STEVE PARTON
RICO Section Chief

FROM: *JH* JOHN HOAG
Assistant Attorney General

DATE: March 3, 1993

RE: Southern Bell

Per your instructions, I am forwarding to you, via Federal Express, the below listed originals of sworn statements and exhibits obtained as part of the investigation of Southern Bell Telephone and Telegraph Company, Inc.:

1. Southern Bell Sworn Statement: Shirley Ferring 3/10/92
Pages 1 - 161.
2. Southern Bell Sworn Statement: Shirley Ferring 3/10/92
Pages 162 - 216. (Exhibits 1-5)
3. Southern Bell Sworn Statement: Robert Rupe 3/24/92
Pages 1 - 99.
4. Southern Bell Sworn Statement: Robert Rupe 3/24/92
Pages 100 - 174. (Exhibits 1-4)
5. Southern Bell Sworn Statement: John B. Bulke
6. Southern Bell Sworn Statement: Hampton Beeker (Pg. 1-80)
7. Southern Bell Sworn Statement: Hampton Beeker (Pg. 81-160)
8. Southern Bell Sworn Statement: Continuation of Hampton Beeker
(Pg. 1-80)
9. Southern Bell Sworn Statement: Continuation of Hampton Beeker
(Pg. 81-172)
10. Southern Bell Sworn Statement: Hampton Beeker (Exhibits 1-6)
11. Southern Bell Sworn Statement: Melanie Davis (Pg. 1-129)
12. Southern Bell Sworn Statement: Melanie Davis (Pg. 1-111)
13. Southern Bell Sworn Statement: Melanie Davis (Exhibits 1-5)
14. Southern Bell Sworn Statement: Melanie Davis (Exhibits 6-17)

15. Southern Bell Sworn Statement: Michael Jansen
16. Southern Bell Sworn Statement: James Powell
17. Southern Bell Sworn Statement: David E. Bailey
18. Southern Bell Sworn Statement: Edward B. Olsen 1/28/92
19. Southern Bell Sworn Statement: Donald Babair
20. Southern Bell Sworn Statement: James H. Ramsey (Pg. 1-100)
21. Southern Bell Sworn Statement: James H. Ramsey (Pg. 101-199 + Exhibits)
22. Southern Bell Sworn Statement: Harry Van Gorden 2/11/92
23. Southern Bell Sworn Statement: Robert Fecht (Pg. 1-141)
(Exhibits 2, 3, 4 & 5)