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September 3, 1991

Suzanne Summerlin, Esq.
Division of Legal Services
Florida Public Svc. Commission
101 East Gaines Street
Tallahassee, FL 32399-0863

**ORIGINAL
FILE COPY**

In re: Docket No. 910163-TL; Responses of Southern Bell Telephone and Telegraph Company to Public Counsel's First, Second, Third, Fourth and Fifth Requests for Production of Documents

Dear Ms. Summerlin:

I am writing to follow up on our recent telephone conversations with regard to Southern Bell's Motions for Temporary Protective Order. These motions were filed with regard to the above-referenced requests to produce filed by Public Counsel and Staff. Southern Bell has produced documents to Public Counsel and Staff responsive to these requests which we believe contain confidential proprietary information. In response to your request for more specific information, we have identified the specific types of documents and information that we believe are confidential and the reasons therefore. This information is listed below by the pleading and the request to which the information is responsive.

ACK _____
AFA _____
APP _____
CAF _____
CMU _____
CTR _____
EAG _____
LEG _____
LIN _____
OPC _____
RCH _____
SEC 1 _____
WAS _____
OTH _____

1. Public Counsel's First Request for Production

a. Southern Bell produced network reviews of the IMC's in Florida in response to Item No. 1. These reviews are substantially the equivalent of internal audits and are, thus, confidential pursuant to Section 364.183(3)(b), Florida Statutes. This matter is more fully discussed in

DOCUMENT NUMBER-DATE

08891 SEP -6 1991

FPSC-RECORDS/REPORTING

Southern Bell's Request for Permanent Protective Order, dated June 24, 1991.

b. The documents produced in response to Item No. 2 contain employee social security numbers which are exempt under Section 364.183(3)(f), Florida Statutes.

c. The documents produced in response to Item No. 3 contain customer specific information, including names, telephone numbers and addresses, which is confidential information pursuant to Section 119.07(3)(w), Florida Statutes.

2. Public Counsel's Second Request for Production

a. The documents produced in response to Item No. 4 contain customer specific information, including names, telephone numbers and addresses, which is confidential information pursuant to Section 119.07(3)(w), Florida Statutes.

3. Public Counsel's Third Request for Production

a. The manuals produced in response to Item Nos. 1, 2 and 10 contain information which, if made public, could allow unauthorized persons, such as computer hackers, to access the computer systems of Southern Bell and, therefore, poses a security threat to the Company and its customers. This information is confidential pursuant to Section 364.183(3)(c), Florida Statutes.

b. The documents produced in response to Item Nos. 6 and 7 contain customer specific information including names, addresses and telephone numbers, which is confidential pursuant to Section 119.07(3)(w), Florida Statutes.

4. Public Counsel's Fourth Request for Production

a. The reviews of the operations of the IMC's produced in response to Item Nos. 1 and 2 are substantially similar to internal audits and are therefore confidential pursuant to Section 364.183(3)(b), Florida Statutes. (See Explanation No. 1.a above)

b. The reviews also contain customer specific information which is confidential itself pursuant to Section 119.07(3)(w), Florida Statutes.

5. Public Counsel's Fifth Request for Production

a. The manuals produced in response to Item Nos. 1, 2, 3 and 8 contain information which, if made public, could allow unauthorized persons, such as computer hackers, to access the computer systems of Southern Bell and, therefore, poses a security threat to the Company and its customers. This information is confidential pursuant to Section 364.183(3)(c), Florida Statutes.

b. The documents produced in response to Item No. 7 contain employee social security numbers which are exempt under Section 364.183(3)(f), Florida Statutes.

c. The documents produced in response to Item Nos. 2, 4, 5, 6, and 7 contain customer specific information including names, addresses and telephone numbers, which is confidential pursuant to Section 119.07(3)(w), Florida Statutes.

d. The security department investigations produced in response to Item Nos. 4, 5, and 7, contain employee social security numbers which are unrelated to the employee's work duties and are, thus, confidential pursuant to Section 364.183(3)(f), Florida Statutes.

6. Staff's First Request for Production

a. The documents known as DLETH's produced in response to Item No. 1 contain customer specific information including names, addresses and telephone numbers, which is confidential pursuant to Section 119.07(3)(w), Florida Statutes.

b. The documents produced in response to Item No. 2 contain customer specific information including names, addresses and telephone numbers, which is confidential pursuant to Section 119.07(3)(w), Florida Statutes.

c. The documents produced in response to Item No. 4 contain customer specific information, including names, telephone numbers and addresses, which is confidential

information pursuant to Section 119.07(3)(w), Florida Statutes.

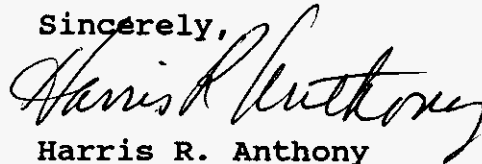
7. Staff's Second Request for Production

a. The DLETH reports produced in response to Item No. 3 contain customer specific information, including names, addresses and telephone numbers, which is confidential pursuant to Section 119.07(3)(w), Florida Statutes.

b. The employee lists produced in response to Item No. 6 contain employee social security numbers which information is unrelated to work performance and is confidential pursuant to Section 364.183(3)(f), Florida Statutes.

Southern Bell has maintained this information as proprietary and confidential. All responses in this docket to requests which are not discussed in this letter should be specific enough for you to render a ruling regarding them. Please let me know if you have any further needs with regard to the discovery procedures used by Southern Bell or if I can be of any further assistance.

Sincerely,



Harris R. Anthony

cc: A. M. Lombardo
R. D. Lackey
Steve Tribble
All Parties of Record