NANCY B. WHITE General Attorney

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Southern Bell Telephone and Telegraph Company 150 South Monroe Street Suite 400 Tallahassee, Florida 32301 (404) 529-5387



June 18, 1992

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

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Notice of Intent to Request Specified Confidential Classification which we ask that you file 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.

ACK	Sincerely yours,	
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<u>CMU</u> Enclosures		
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CERTIFICATE OF SERVICE Docket No. 920260-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this 18th day of June, 1992 to:

Robin Norton Division of Communications Florida Public Service Commission 101 East Gaines Street Tallahassee, FL 32399-0866

Angela Green Division of Legal Services Florida Public Svc. Commission 101 East Gaines Street Tallahassee, FL 32399-0863

Joseph A. McGlothlin Vicki Gordon Kaufman McWhirter, Grandoff & Reeves 522 East Park Avenue, Suite 200 Tallahassee, Florida 32301 atty for FIXCA

Joseph Gillan J. P. Gillan and Associates Post Office Box 541038 Orlando, Florida 32854-1038

Patrick K. Wiggins Wiggins & Villacorta, P.A. Post Office Drawer 1657 Tallahassee, Florida 32302 atty for Intermedia

Floyd R. Self, Esq. Messer, Vickers, Caparello, Madsen, Lewis & Metz, PA Post Office Box 1876 Tallahassee, FL 32302 atty for US Sprint Charles J. Beck Deputy Public Counsel Office of the Public Counsel 111 W. Madison Street Room 812 Tallahassee, FL 32399-1400

Michael J. Henry MCI Telecommunications Corp. MCI Center Three Ravinia Drive Atlanta, Georgia 30346-2102

Richard D. Melson Hopping Boyd Green & Sams Post Office Box 6526 Tallahassee, Florida 32314 atty for MCI

Rick Wright Regulatory Analyst Division of Audit and Finance Florida Public Svc. Commission 101 East Gaines Street Tallahassee, FL 32399-0865

Peter M. Dunbar Haben, Culpepper, Dunbar & French, P.A. 306 North Monroe Street Post Office Box 10095 Tallahassee, FL 32301 atty for FCTA

Chanthina R. Bryant Sprint 3065 Cumberland Circle Atlanta, GA 30339

ancy B. White (22)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Comprehensive Review of the Revenue Requirements and Rate Stabilization Plan of Southern Bell Telephone and Telegraph Company (Formerly FPSC Docket Number 880069-TL)

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Docket No. 920260-TL Filed: June 18, 1992

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S NOTICE OF INTENT TO REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATION

COMES NOW, BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), and files its Notice of Intent to Request Specified Confidential Classification.

1.

The Staff of the Florida Public Service Commission ("Staff") has issued its First Request for Production in the abovecaptioned docket, requesting that Southern Bell furnish, in response to Item No. 15, a copy of the General Ledger for 1991.

2.

Some of the information contained in the General Ledger is clearly proprietary. The ledger contains data on non-regulated activities as well as regulated. Any competitor or potential competitor of Southern Bell's non-regulated services would desire this information to allow the targeting of lucrative markets. If this were to occur, Southern Bell's revenues could well be diminished with the resulting shortfall which would work to the ultimate detriment of Southern Bell's ratepayers.

> DOCUMENT NOMBER-DATE 06463 JUN 18 188 PPSC-RECORDS/REPORT

Because these computer records contain proprietary information, 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, in order to allow the Staff to take possession of the computer records without delay. 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 written Staff Request is attached hereto.

Respectfully submitted this 18th day of June, 1992.

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

HARRIS R. ANTHONY (2R)

PHILLIP J. CARVER c/o Marshall M. Criser, III 150 South Monroe Street Suite 400 Tallahassee, Florida 32301 (305) 530-5555

R. DOUGLAS LACKEY NANCY B. WHITE 675 West Peachtree Street, N.E. Room 4300 Southern Bell Center Atlanta, Georgia 30375 (404) 529-3862 (404) 529-5387

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive review of) DOCKET NO. 920260-TL the revenue requirements and) rate stabilization plan of) FILED: 04/17/92 SOUTHERN BELL TELEPHONE AND) TELEGRAPH COMPANY.)

1. 1

STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO BELLSOUTH TELECOMMUNICATIONS, INC., d/b/a SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

Pursuant to Rule 25-22.034, Florida Administrative code, and Rule 1.350, Florida Rules of Civil Procedure, the Staff of the Florida Public Service Commission, by and through its undersigned attorney, hereby serves the following Request for Production of Documents upon BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company.

Please produce the following documents at the Florida Public Service Commission, 101 East Gaines Street, Room 226, Fletcher Building, Tallahassee, Florida, no later than thirty days after service of this request for the purpose of inspection and copying.

DEFINITIONS

As used herein, the word "documents" shall mean the original and any non-identical copies of any writing or record, including but not limited to a book, pamphlet, periodical, letter, memorandum, telegram, report, study, interoffice or intraoffice, handwritten or other notes, working paper, draft, application, permit, chart, paper, graph, survey, index, tape, disc, data sheet or data processing card, computer printout, or any other written, STAFF'S FIRST PRODUCTION OF DOCUMENTS DOCKET NO. 920260-TL

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recorded, transcribed, filed or graphic matter, however produced or reproduced.

DOCUMENTS REQUESTED

- Provide all workpapers which contain detailed calculations supporting the rate base, capital structure, and NOI adjustments.
- 2. Provide all workpapers which contain detailed calculations supporting all proforma adjustments.
- 3. Provide a list of all responsibility cost centers and a brief description of each code. These centers should not be limited to Southern Bell, but should include all cost centers whereby costs are allocated to Southern Bell.
- 4. Provide descriptions as to how these responsibility cost centers translate the financial data into primary accounts.
- 5. Provide the most current Function Code manual.
- 6. Provide the most current budget manual.

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STAFF'S FIRST PRODUCTION OF DOCUMENTS DOCKET NO. 920260-TL

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- 7. Provide the 1992 and 1993 budgets.
- List all assumptions used in budgeting the 1992 and 1993 year.
- 9. Complete the attached schedules A through I which detail charges from BellSouth and affiliates to Southern Bell.
- 10. Provide management and executive incentive compensation plan manual.
- 11. Provide the workpapers that calculate the Universal Service Fund (USF) amount for 1991, 1992, and 1993.
- 12. Provide the worksheets submitted to the National Exchange Carrier Association (NECA) for 1991 and 1992.
- 13. Provide the ARMIS data, consisting of reports 43-02, 43-03, and 43-04, that are filed with the FCC, for 1991.
- Provide a current copy of the Chart of Accounts, and a brief description of each account.

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STAFF'S FIRST PRODUCTION OF DOCUMENTS DOCKET NO. 920260-TL

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- 15. Provide a copy of the regulated General Ledger for for the year ending December 31, 1991.
- 16. Provide a copy of the total company General Ledger which includes nonregulated activity for the year ending December 31, 1991.

ANGELA B. GREEN Staff Counsel

Florida Public Service Commission 101 E. Gaines Street Tallahassee, FL 32399-0863 (904) 487-2740