

J. Phillip Carver  
General Attorney

Southern Bell Telephone  
and Telegraph Company  
c/o Marshall M. Criser III  
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Phone (305) 530-5558

June 30, 1993

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

*920260-TL*

Re: Docket No. 910163-TL - Repair Service Investigation

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 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 to the parties shown on the attached Certificate of Service.

Sincerely yours,  
*J. Phillip Carver (02)*  
J. Phillip Carver

ACK  \_\_\_\_\_  
AFA  \_\_\_\_\_  
APP  \_\_\_\_\_  
CAF  \_\_\_\_\_  
CNU  \_\_\_\_\_

Enclosures

cc: All Parties of Record  
A. M. Lombardo  
Harris R. Anthony  
R. Douglas Lackey

LIN  \_\_\_\_\_  
OPC \_\_\_\_\_  
RCH \_\_\_\_\_

REC RECEIVED & FILED

WAS *[Signature]*  
GTH FPSC BUREAU OF RECORDS AND REPORTING

A BELL SOUTH Company

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**CERTIFICATE OF SERVICE**

**Docket No. 920260-TL**  
**Docket No. 910163-TL**  
**Docket No. 910727-TL**  
**Docket No. 900960-TL**

I HEREBY CERTIFY that a copy of the foregoing has been  
furnished by United States Mail this 30<sup>th</sup> day of June, 1993  
to:

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

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atty for FIXCA

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Stan Greer  
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Florida Public Svc. Commission  
101 East Gaines Street  
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(P)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition on behalf of ) Docket No. 910163-TL  
Citizens of the State of Florida )  
to initiate investigation into )  
integrity of Southern Bell )  
Telephone and Telegraph Company's )  
repair service activities and )  
reports. )  
\_\_\_\_\_ ) Filed: June 30, 1993

**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 pursuant to Rule 25-22.006, Florida Administrative Code, files its Notice of Intent to Request Specified Confidential Classification.

1. The Office of Public Counsel ("Citizens") issued a Notice of Deposition in the referenced docket in order to take the depositions of Southern Bell employees on June 14, 15, 16, 17, and 18, 1993 in Lake Worth and Ft. Pierce, Florida. The depositions of the following employees who were deposed at the above-noted dates have been transcribed and were received by Southern Bell on the date of this filing: Kathy Blair, Joann Davis, Carmen Ortiz, Alice Short, James Bryant, and Robert Corriveau.

2. Some of the information contained in the depositions is proprietary. Included is information containing, among other

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things, employee names, home addresses, home phone numbers, and business addresses and telephone numbers. This information is clearly confidential and proprietary under Florida Statutes, Section 364.183(f), which provides that "proprietary confidential business information" includes "employee personnel information unrelated to compensation, duties, qualification, or responsibilities."


3. 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 demonstrates that the employee-specific information provided in response to the deposition questions do not fit any of the exceptions and thus are, per se, confidential under Section 364.183(f), Florida Statutes.

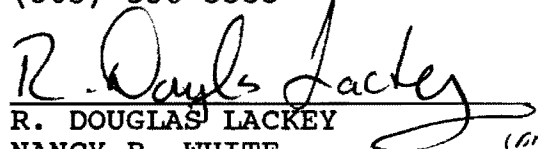
4. Because this information contains proprietary information, Southern Bell is filing this Notice of Intent to Request Specified Confidential Classification, pursuant to Rule 25-22.006(3)(a)(b)(5), Florida Administrative Code, in order to allow the Staff to take possession of the deposition transcripts 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 Citizens Notice of Deposition is attached hereto.

Respectfully submitted this 30th Day of June, 1993.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY

  
HARRIS R. ANTHONY (ps)  
c/o Marshall M. Criser, III  
400 - 150 South Monroe Street  
Tallahassee, Florida 32301  
(305) 530-5555

  
R. DOUGLAS LACKEY (ps)  
NANCY B. WHITE  
4300 - 675 West Peachtree St.  
Atlanta, Georgia 30375  
(404) 529-5387

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition on behalf of CITIZENS )	
OF THE STATE OF FLORIDA to initiate )	DOCKET NO. 910163-TL
investigation into integrity of SOUTHERN) )	
BELL TELEPHONE & TELEGRAPH COMPANY'S )	FILED: June 9, 1993
repair service activities and reports. )	

CORRECTED NOTICE OF DEPOSITION UPON ORAL EXAMINATION

TO: Harris R. Anthony, Esq.  
 c/o Marshall M. Criser III  
 BellSouth Telecommunications, Inc.  
 d/b/a/ Southern Bell Telephone &  
 Telegraph Company  
 150 S. Monroe Street  
 Tallahassee, FL 32301

NOTICE is hereby given that, pursuant to Florida Rule of Civil Procedure 1.310(b)(6), the Citizens of Florida, by and through Jack Shreve, Public Counsel, will take the sworn depositions of the following BellSouth employees as shown on the attached schedule in Lake Worth and Fort Pierce:

Kathy C. Blair, Susan Boggs, James Bryant, Robert Corriveau, Joann Davis, Mary Dunn, Susan Eckhoff, Carol Egers, Jerry Fink, Franklin Holden, Floyd Knowles, Karen Lewis, John B. Morgan, Betty Moore, Roger Morse, Peter Murray, George Nicholson, Carmen Ortiz, Frank Perniciaro, Alice Short, Reba Smith, Michael Tartaglio, Helen Vance, Joseph Violante, Helen C. Vought, Harold Weaver, and Raymond White.

The depositions, which are for the purpose of discovery and such other purposes as are permitted by the Florida Rules of Civil Procedure, will cover the customer repair and rebate systems and any other matters related to the consolidated rate case docket 920260-TL.

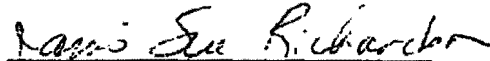
The depositions are scheduled at the following locations and times indicated:

Monday, June 14 - Wednesday, June 16, 1993, at 8:00 a.m.  
 Southern Bell Telephone & Telegraph Company  
 120 North K

Lake Worth, Florida

Thursday, June 17 - Friday, June 18, 1993 at 8:00 a.m.  
Southern Bell Telephone & Telegraph Company  
3300 Okeechobee  
Ft. Pierce, Florida

Dated this 8th day of June 1993.



JANIS SUE RICHARDSON  
Associate Public Counsel

Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street  
Room 812  
Tallahassee, Florida 32399-1400

(904) 488-9330

Attorney for the Citizens  
of the State of Florida



LAKE WORTH/WPB-120 North K, Lake Worth

	<u>June 14</u>	<u>June 15</u>	<u>June 16</u>
08:00 a.m.	Violante, Joseph	Morse, Roger	Short, Alice
09:15 a.m.	Vance, Helen	Weaver, Harold	Fink, Jerry
10:30 a.m.	Lewis, Karen	Ortiz, Carmen	Blair, Kathy
11:45 a.m.	Lunch	Lunch	Lunch
12:45 p.m.	Boggs, Susan	Davis, Joann	Nicholson, G.
02:00 p.m.	Eckhoff, Susan	Holden, Franklin	
03:15 p.m.	Bryant, James	Corriveau, Robert	
04:30 p.m.	White, Raymond		

FT. PIERCE-3300 Okeechobee, Ft. Pierce

	<u>June 17</u>	<u>June 18</u>
08:00 a.m.		08:30 a.m. Egers, Carol
09:00 a.m.	Smith, Reba	09:30 a.m. Perniciaro, Frank
10:00 a.m.	Vought, Helen C.	
11:00 a.m.	Dunn, Mary	
12:00 p.m.	Lunch	
01:00 p.m.	Murray, Peter	
02:00 p.m.	Moore, Betty	
03:00 p.m.	Morgan, John B.	
04:00 p.m.	Knowles, Floyd	
05:00 p.m.	Tartaglio, Michael	

**CERTIFICATE OF SERVICE  
DOCKET NO. 920260-TL**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail or hand-delivery to the following parties on this 9th day of June, 1993.

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Florida AARP Capital City Task  
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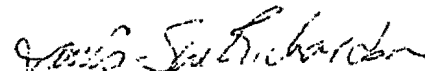
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