

STATE OF FLORIDA

OFFICE OF THE PUBLIC COUNSEL



c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, Florida 32399-1400 904-488-9330

August 4, 1993

930260-TC

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

RE: Docket No. 910163-TL & 910727-TL - Southern Bell Telephone & Telegraph Co. -- Repair and Rebate Investigation (Consolidated Docket 920260-TL - Rate Stabilization)

Dear Mr. Tribble:

Enclosed please find three copies of Public Counsel's Notice of Deposition Upon Oral Examination, which we ask you to file in these dockets. The original and one copy have been served on Southern Bell Telephone and Telegraph Company by hand delivery on this date.

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 yours,

Janis Sue Richardson Associate Public Counsel

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Enclosures

OPC -cc: All Parties of Record

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DOCUMENT HUMBER-DATE

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition on behalf of CITIZENS)
OF THE STATE OF FLORIDA to initiate)
investigation into integrity of SOUTHERN)
BELL TELEPHONE & TELEGRAPH COMPANY'S)
repair service activities and reports.)

Docket No. 910163-TL

In re: Investigation into Southern Bell)
Telephone and Telegraph Company's)
Compliance with Rule 25-4.110(2))
(Rebates)

Docket No. 910727-TL

Filed: August 4, 1993

NOTICE OF DEPOSITION UPON ORAL EXAMINATION

TO: Harris R. Anthony, Esq. c/o Marshall M. Criser III 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 deposition of BellSouth Telecommunications, Inc., d/b/a/ Southern Bell Telephone and Telegraph Company for purposes of discovery and such other purposes as are permitted by the Florida Rules of Civil Procedure. The deposition will cover the processing of the trouble reports and rebates attached as Attachments 1, 2, and 3 to Citizens' forty-second set of interrogatories and the documents produced in response to Citizens' forty-fourth and forty-fifth sets of production of documents.

The company is requested to produce employees with personal knowledge as to the rebates and the trouble reports involved in

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procedural matters involved in identifying the trouble reports to be rebated and the manual processing of the rebates. Employees with knowledge of the trouble reporting and billing/rebating systems, including but not limited to LMOS (front end and back end) and MOOSA, and any changes to those systems related to these trouble reports and rebates, are requested to appear.

The employees, appearing on behalf of the company, are requested to bring to the deposition (see Citizens' forty-fifth production of documents request attached) all documents necessary to respond to Public Counsel's questions on the trouble reports and rebates identified as attachments 1, 2, and 3 to Citizens' forty-second set of interrogatories. This includes but is not limited to BellSouth Practices for processing trouble reports and rebates, coding definitions for the trouble reports and rebate forms, copies of Attachments 1, 2, and 3 to Citizens' forty-second set of interrogatories, and any other documents necessary to fully respond to questions related to these reports and rebates.

The deposition is scheduled at the following location and time:

Wednesday, September 8, 1993, 9:00 a.m. Office of Public Counsel 111 West Madison Street Room 812 Tallahassee, FL 32399-1400 (904) 488-9330

Dated this 4th day of August 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

CERTIFICATE OF SERVICE DOCKETS NOS. 910163-TL, 920260-TL, 900960-TL, 910727-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 4th day of August, 1993.

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