

J. Phillip Carver  
General Attorney

Southern Bell Telephone  
and Telegraph Company  
c/o Marshall M. Criser III  
Suite 400  
150 So. Monroe Street  
Tallahassee, Florida 32301  
Phone (305) 530-5558

ORIGINAL  
FILE COPY

September 30, 1993

920260-TL

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) - 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.

- ACK 1
- AFA 1
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU 1
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 1
- LIN 6
- OPC \_\_\_\_\_
- RCH 1
- SEC 1
- WAS \_\_\_\_\_
- OTH KS

Sincerely yours,  
*J. Phillip Carver*  
J. Phillip Carver

Enclosures

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

DOCUMENT NUMBER-DATE

10559 SEP 30 83

FPSC-RECORDS/REPORTING

**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 <sup>30<sup>th</sup></sup> day of *Sept.*, 1993  
to:

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

Tracy Hatch  
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  
315 South Calhoun Street  
Suite 716  
Tallahassee, FL 32301-1838  
atty for FIXCA

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

Kenneth A. Hoffman  
Messer, Vickers, Caparello,  
Madsen, Lewis & Metz, PA  
Post Office Box 1876  
Tallahassee, FL 32302  
atty for FPTA

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

Laura L. Wilson, Esq.  
c/o Florida Cable Television  
Assoc. Inc.  
Post Office Box 10383  
310 North Monroe Street  
Tallahassee, FL 32302  
atty for FCTA

Chanthina R. Bryant  
Sprint Communications Co.  
Limited Partnership  
3065 Cumberland Circle  
Atlanta, GA 30339

Michael W. Tye  
AT&T Communications of the  
Southern States, Inc.  
106 East College Avenue  
Suite 1410  
Tallahassee, Florida 32301

Dan B. Hendrickson  
Post Office Box 1201  
Tallahassee, FL 32302  
atty for FCAN

Benjamin H. Dickens, Jr.  
Blooston, Mordkofsky,  
Jackson & Dickens  
2120 L Street, N.W.  
Washington, DC 20037  
Atty for Fla Ad Hoc

C. Everett Boyd, Jr.  
Ervin, Varn, Jacobs, Odom  
& Ervin  
305 South Gadsen Street  
Post Office Drawer 1170  
Tallahassee, Florida 32302  
atty for Sprint

Florida Pay Telephone  
Association, Inc.  
c/o Mr. Lance C. Norris  
President  
Suite 202  
8130 Baymeadows Circle, West  
Jacksonville, FL 32256

Monte Belote  
Florida Consumer Action Network  
4100 W. Kennedy Blvd., #128  
Tampa, FL 33609

Bill L. Bryant, Jr., Esq.  
Foley & Lardner  
Suite 450  
215 South Monroe Street  
Tallahassee, FL 32302-0508  
Atty for AARP

Michael B. Twomey  
Gerald B. Curington  
Department of Legal Affairs  
Room 1603, The Capitol  
Tallahassee, FL 32399-1050

Mr. Douglas S. Metcalf  
Communications Consultants,  
Inc.  
631 S. Orlando Ave., Suite 250  
P. O. Box 1148  
Winter Park, FL 32790-1148

Mr. Cecil O. Simpson, Jr.  
General Attorney  
Mr. Peter Q. Nyce, Jr.  
General Attorney  
Regulatory Law Office  
Office of the Judge  
Advocate General  
Department of the Army  
901 North Stuart Street  
Arlington, VA 22203-1837

Mr. Michael Fannon  
Cellular One  
2735 Capital Circle, NE  
Tallahassee, FL 32308

Floyd R. Self, Esq.  
Messer, Vickers, Caparello,  
Madsen, Lewis, Goldman & Metz  
Post Office Box 1876  
Tallahassee, FL 32302-1876  
Attys for McCaw Cellular

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

Stan Greer  
Division of Communications  
Florida Public Svc. Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0863



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: September 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 ("Public Counsel") issued a Notice of Deposition in the above-referenced docket in order to take the depositions of Southern Bell employees on July 27 through July 31, 1992 in Miami, Riveria Beach, Orlando, Gainesville, Jacksonville, and Fort Lauderdale, Florida. The depositions of the following Southern Bell employees that were taken pursuant to this notice have been transcribed and were received by Southern Bell on September 29, 1993: Florida Bell Green, James T. Febus, William David Morris, III, Carl J. Kingcade, Richard Bird, Robert J. Connor, Dorothy E. Hall, Jose

DOCUMENT NUMBER-DATE  
10581 SEP 30 8  
FPSC-RECORDS/REPORTING

Rugama, Marisela Soto, Alexander B. Moir, Georgina Maestri, Geoffrey Liebrich, Sandra Terry, Robert Bernard Welt, Cheryl Yvette Johnson, Lawrence J. Long, Christina Haney, Maria Munoz, Rodolfo E. Leon, Joyce Hamman, Betty J. Malone, Kathleen A. Reed, Althea Nichols, James W. Harris, James H. Thomas, Dennis Slattery, Dennis William Marshall, Everett Bruce Hensey, Clarence Edwards Hankerson, and Georgia Mikle.

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

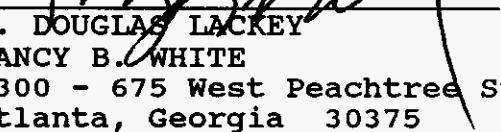
exceptions and thus are, per se, confidential under Section 364.183(f), Florida Statutes.

4. Because these depositions 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 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. Public Counsel's Notice of Deposition dated July 21, 1992 is attached hereto.

Respectfully submitted this 30th day of September, 1993.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY

  
HARRIS R. ANTHONY (622)  
J. PHILLIP CARVER  
c/o Marshall M. Criser, III  
400 - 150 South Monroe Street  
Tallahassee, Florida 32301  
(305) 530-5555

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

ATTACHMENT

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  
FILED: July 21, 1992

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 Miami, Ft. Lauderdale, Riveria Beach,  
Orlando, Gainesville and Jacksonville:

- Miami: R.E. Leon, C. Calvert, R. Kummer, J. Long, D. Hall, P. Taylor, W.D. Morris, C. Hernandez, R.J. Connor, R. Bird, Florida Green, C. Kingcade, F. Shanaver, P. Moran, C. Johnson, J. Rugama, C. Haney, G. Maestri, A. Moir, S. Low-Ajam, M. Munoz, L. Farmer, S. Terry, M. Soto, G. Liebrich, L. Johnson, R. Welt, J.T. Febus;
- Ft. Lauderdale: R. Sattizahn, D. Slattery, K. Reed, A. Herrera, G. Maser, L. Schmoll, A. Nichols, E. Hensey, J. Harris, G. Mikle, C. Hankerson, J. Hamman, J. Thomas, B. Malone, D. Marshall;
- Riveria Beach: G. Lewis, F. Knowles, P. White, W. A. England, A. Ferrer, C. Smith, L. Figler, B. Roberts, T. Crampton, W. Guyer, L. Byrd, L. Bertone, G. Coffone, D. Porter, L. Lytle; Orlando: B. Higgins, N. Robak, R. Land, L. Batchlor, W. McGowan, G. Morse, L. Dufresne, L. Gray, J. Sontag, R. Haltiwanger; Gainesville: J.

Finnegan, G. Swilley, R.P. Collanati, J. Griffeth, D. House, J. Dean, C. Smith, H. Adams, M. Myers, J. Canavan, J. Bulko, J. Ransley, Jacksonville; T. Kellerman, R. Rupe, T.C. Taylor, R. Buford, J. Melton.

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 related matters.

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

Monday, July 27, 1992, at 8:00 a.m.  
Southern Bell Telephone & Telegraph Company  
666 N.W. 79th Ave., room 642  
Miami, Florida  
and  
3640 Avenue E, room 316  
Riveria Beach, Florida

Tuesday, July 28, 1992, at 8:00 a.m.  
Southern Bell Telephone & Telegraph Company  
666 N.W. 79th Ave., room 642  
Miami, Florida  
and  
3640 Avenue E, room 316  
Riveria Beach, Florida

Wednesday, July 29, 1992 at 8:00 a.m.  
Southern Bell Telephone & Telegraph  
666 N.W. 79th Ave., room 642  
Miami, Florida  
and  
7900 Mandarin Blvd.  
Orlando, Florida

Thursday, July 30, 1992 at 8:00 a.m.  
Southern Bell Telephone & Telegraph Company  
6451 N. Federal Hwy., room 1015A  
Ft. Lauderdale, Florida  
and  
903 West University Ave.  
Gainesville, Florida



Friday, July 31, 1992 at 8:00 a.m.  
Southern Bell Telephone & Telegraph Company  
6451 N. Federal Hwy., room 1015A  
Ft. Lauderdale, Florida  
and  
301 W. Bay St., 20th Floor  
Jacksonville, Florida

Dated this 21st day of July 1992.

*Janis Sue Richardson*  
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

17. 20. 92 04:44 PM

P02

**SCHEDULE OF EMPLOYEES' TO BE DEPOSED BY THE OFFICE OF PUBLIC  
COUNSEL AND FLORIDA PUBLIC SERVICE COMMISSION**

**MIAMI FLORIDA-RM 642, 666 N.W. 79TH AVENUE**

	JULY 27	JULY 28	JULY 29
8:00-8:45A	R.E. Leon	R. Bird	A. Moir
8:45-9:30A	C. Calvert	Florida Green	S. Lom-Ajam
9:30-10:15A	R. Kummer	C. Kingscade	M. Munoz
10:15-11:00A	J. Long	F. Shanaver	L. Farmer
11:00-11:45A	D. Hall	P. Moran	S. Terry
11:45-12:45P	Lunch	Lunch	Lunch
12:45-1:30P	P. Taylor	C. Johnson	M. Soto
1:30-2:15P	W.D. Morris	J. Rugama	G. Liebrich
2:15-3:00P	C. Hernandez	C. Haney	L. Johnson
3:00-3:45P	R.J. Connor	G. Maestri	R. Walt
3:45-4:30P	J.T. Febus		

**Ft. Lauderdale-RM 1015A, 6401 N. Federal Highway**

	JULY 30	JULY 31
8:00-8:45A	R. Sattisahn	G. Mickle
8:45-9:30A	D. Slattery	C. Hankerson
9:30-10:15A	K. Reed	J. Hamman
10:15-11:00A	A. Herrera	J. Thomas
11:00-11:45A	G. Maser	B. Malone
11:45-12:45P	Lunch	Lunch
12:45-1:30P	L. Schmoll	
1:30-2:15P	A. Nichols	
2:15-3:00P	E. Hensy	
3:00-3:45P	J. Harris	
3:45-4:30P	D. Marshall	

17.20.92 04:44 PM

P03

**SCHEDULE OF EMPLOYERS' TO BE DEPOSED BY THE OFFICE OF PUBLIC COUNSEL AND FLORIDA PUBLIC SERVICE COMMISSION**

West Palm Beach-Rm. 316, 3640 Avenue E, Riviera Beach

	JULY 27	JULY 28
8:00-8:45A	G. Lewis	L. Bertone
8:45-9:30A	J. Knowles	G. Coffone
9:30-10:15A	P. White	D. Porter
10:15-11:00A	W.A. England	L. Lytle
11:00-11:45A	A. Ferrar	
11:45-12:45P	Lunch	
12:45-1:30P	C. Smith	
1:30-2:15P	L. Figler	
2:15-3:00P	B. Roberts	
3:00-3:45P	F. Crampton	
3:45-4:30P	W. Guyar	
4:30-5:15P	L. Byrd	

17.20.92 04:44 PM

P04

**SCHEDULE OF EMPLOYEES' TO BE DEPOSED BY THE OFFICE OF PUBLIC  
COUNSEL AND FLORIDA PUBLIC SERVICE COMMISSION**

	Orlando-7900 Mandarin Blvd	Gainesville-903 West University Ave.	Jacksonville 301 W. Bay St. 20th Floor
	July 29	July 30	July 31
8:00-8:45A	B. Higgins	J. Finnegan	T. Kellermann
8:45-9:30A	N. Robak	G. Swilley	R. Rupe
9:30-10:15A	R. Land	R.P. Collamati	T. C. Taylor
10:15-11:00A	L. Batchelor	J. Griffeth	R. Buford
11:00-11:45A	W. McGowan	D. House	J. Melton
11:45-12:45P	Lunch	Lunch	Lunch
12:45-1:30P	G. Morse	J. Dean	
1:30-2:15P	L. Dufresne	C. Smith	
2:15-3:00P	L. Gray	H. Adams	
3:00-3:45P	J. Sontag	M. Myers	
3:45-4:30P	R. Hiltiwanger	J. Canavan	
4:30-5:15P		J. Bulko	
5:15-6:00P		J. Ramsey	

**CERTIFICATE OF SERVICE**  
**Docket No. 910163-TL**

I HEREBY CERTIFY that the attached NOTICE OF DEPOSITION UPON ORAL EXAMINATION has been served by U.S. Mail or hand-delivery, this 21st day of July, 1992 to the following:

Harris R. Anthony, Esq.  
BellSouth Telecommunications, Inc.  
d/b/a/ Southern Bell Telephone  
& Telegraph Company  
c/o Marshall M. Criser, III  
150 S. Monroe Street, Suite 400  
Tallahassee, Florida 32301

Tracy Hatch, Esq.  
Jean Wilson, Esq.  
Division of Legal Services  
Fla. Public Service Commission  
101 East Gaines Street  
Tallahassee, FL 32301

John Hoag, Esq.  
Department of Legal Affairs  
Presidential Circle  
4000 Hollywood Ave.  
5th Fl., Rm. 10  
Hollywood, FL 33021

*Janis Sue Richardson*  
JANIS SUE RICHARDSON  
Associate Public Counsel

Office of the Public Counsel  
111 West Madison Street  
Room 812  
Tallahassee, FL 32399-1400