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

October 7, 1993



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

Re: <u>Docket No. 910163-TL - Repair Service Investigation</u>

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Amendment to 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, Carver (BW)

J. Phillip Carver

Enclosures

cc:

RECEIVED & FILED

ACK

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

DOCUMENT NUMBER-DATE

A **BELL**SOUTH Company

FPSC-RECORDS/REPORTING

10802 OCT-78

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  $7^{T\!M}$  day of  $00^{-1}$ , 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

\_]. Phillip Carver (BW)

# URIGENAL FILE COSY

# 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 and Telegraph Company's repair service activities and reports.

•

Docket No. 910163-TL

Filed: October 7, 1993

## SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S AMENDMENT TO NOTICE OF INTENT TO REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATON

COMES NOW BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), pursuant to Rule 25-22.006, Florida Administrative Code, and hereby files its Amendment to Notice of Intent to Request Specified Confidential Classification, and states the following:

1. On October 5, 1993 Southern Bell filed a Notice of Intent to Seek Confidential Classification for information contained in the depositions of certain Southern Bell employees that were identified therein. In paragraph 5 of this Notice, Southern Bell stated that Public Counsel's two Notices of Deposition dated July 21, 1992, and October 7, 1992 were attached to the Notice.

2. Southern Bell has subsequently discovered that the Notice of Deposition dated July 21, 1992 was inadvertently not attached to the Notice.

> DOCUMENT NUMBER-DATE 10802 OCT-78 FPOC-RECORDS/REPORTING

3. Therefore, Southern Bell hereby amends its Notice by filing the above-referenced Deposition, which is attached hereto.

Respectfully submitted this 7th day of October, 1993.

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

how (HW)

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

(BW)

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

2

ATTACHMENT

### BEFORE THE FIORIDA 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. Lom-Ajam, M. Munoz, L. Farmer, S. Terry, M. Soto, G. Liebrich, L. Johnson, R. Welt, J.T. Febus; <u>Yt. Lauderdale:</u> 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; <u>Biveria Beach:</u> 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; <u>Orlando:</u> B. Higgins, N. Robak, R. Land, L. Batchlor, W. McGowan, G. Morse, L. Dufresne, L. Gray, J. Sontag, R. Haltiwanger; <u>Gainesville:</u> J. Finnegan, G. Swilley, R.P. Collamati, J. Griffeth, D. House, J. Dean, C. Smith, H. Adams, M. Myers, J. Canavan, J. Bulko, J. Ramsey; <u>Jacksonville</u>; T. Kellerman, R. Rupe, T.C. Taylor, R. Buford, J. Melton.

٠×.

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 Pt. Lauderdale, Florida and 903 West University Ave. Gainesville, Florida

2

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.

.

k

60 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

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

-

. And the second

.....

. . . . . . . . .

;

:

an an air samar araa sea.

••• .

• •

.....

NIANI FLORIDA-RM 542, 656 N.H. 79TE AVENUE					
	JULY 27	JULY 28	JULY 29		
8:00-9:45a	R.E. Laon	R. Bird	A. Koir		
8145-9130A	C. Calvert	Florida Green	ŝ. Lom-Ajam		
9:30-10:15A	R. Kummer	C. Kingcade	N. Munoz		
10:15-11:00A	J. Long	F. Shanaver	L. Farmer		
11:00-11:45A	D. Hall	P. Moran	8. Terry		
11:45-12:45P	Lunch	Lunch	Lunch		
12:45-1:30P	P. Taylor	C. Johnson	N. Soto		
1:30-2:15p	W.D. Morris	J. Rugana	G. Liebrich		
2:15-3:00P	C. Hernandez	C. Haney	L. Johnson		
3:00-3:45P	R.J. Connor	G. Maestri	R. Welt		
3:45-4:30P	J.T. Febus	N Todayat Bichy	-104p		
Ft. Lauderdale-Rm 1015A, 6451 H. Tederal Highway					
IC. DBUGBEGHLE			vely		
	JULY 30	JULY 31			
		JULY 31			
	JULY 30 R. Sattizahn	JULY 31 G. Mikle			
8100-0145A	JULY 30 R. Sattizahn D. Slattery	JULY 31 G. Mikle	<u>ray</u>		
8100-8145A 8145-9130A	JULY 30 R. Sattigahn D. Slattery K. Reed	JULY 31 G. Mikle C. Bankerson	<u>vuy</u>		
8:00-8:45A 8:45-9:30A 9:30-10:15A	JULY 30 R. Sattigahn D. Slattery K. Reed A. Herrera	JULY 31 G. Mikle C. Bankerson J. Hamman	<u>vu y</u>		
8:00-8:45A 8:45-9:30A 9:30-10:15A 10:15-11:00A	JULY 30 R. Sattigahn D. Slattery K. Reed A. Herrera G. Maser	JULY 31 G. Mikle C. Hankerson J. Hamman J. Thomas			
8:00-8:45A 8:45-9:30A 9:30-10:15A 10:15-11:00A 11:00-11:45A	JULY 30 R. Sattimahn D. Slattery K. Reed A. Herrera G. Maser	JULY 31 G. Mikle C. Hankerson J. Hamman J. Thomas B. Nalone			
8:00-8:45A 8:45-9:30A 9:30-10:15A 10:15-11:00A 11:00-11:45A 11:45-12:45P	JULY 30 R. Sattimahn D. Slattery K. Reed A. Herrera G. Maser Launch	JULY 31 G. Mikle C. Hankerson J. Hamman J. Thomas B. Nalone			
8:00-8:45A 8:45-9:30A 9:30-10:15A 10:15-11:00A 11:00-11:45A 11:45-12:45P 12:45-1:30P	JULY 30 R. Sattisahn D. Slattery K. Reed A. Herrera G. Maser Launch L. Schmoll	JULY 31 G. Mikle C. Hankerson J. Hamman J. Thomas B. Nalone			
8:00-8:45A 8:45-9:30A 9:30-10:15A 10:15-11:00A 11:00-11:45A 11:45-12:45P 12:45-1:30P 1:30-2:15P	JULY 30 R. Sattisahn D. Slattery K. Reed A. Herrera G. Maser Launch L. Schmoll A. Nichols	JULY 31 G. Mikle C. Hankerson J. Hamman J. Thomas B. Nalone			

- - - - -

THE JUST

٠

₩.

κ.

• •

٠

л <sup>т</sup>

.

· . .

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

	Orlando-7900 Nandarin Blyd	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. Collemati '	T. C. Taylor
10:15-11:00A	L. Batchelor	J. Griffeth -	R. Buford ·
11:00-11:45A	W. NoGowan	D. House .	J. Melton ·
11:45-12:45P	Lunch	Lunch	Lunch
12:45-1:30P	G. Morse	J. Dean-	
1:30-2:16P	L. Dufresne	C. smith	•
2:15-3:00P	L. Gray	H. Adams	
3:00-3:45P	J. Sontag	M. Myers '	
3145-4130F	R. Heltiwanger	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

ł

-. .

handoon JANIS SUE RICHARDSON

Associate Public Counsel

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