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

May 21, 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.

> Sincerely yours, J. Phillip Canun J. Phillip Carver

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Enclosures

RECEIVED & FILLD

cc:

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

A BELLSOUTH Company

DOCUMENT NUIDER-DATE

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CERTIFICATE OF SERVICE Docket No. 920260-TL Docket No. 900960-TL Docket No. 910163-TL Docket No. 910727-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this 21 day of May, 1993

to:

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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

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 and Cox

Laura L. Wilson, Esq. 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

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 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 Assistant Attorney General 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

A. Phillip Canun (2)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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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: May 21, 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 Staff of the Florida Public Service Commission ("Staff") issued a Notice of Deposition in the referenced docket in order to take the depositions of Southern Bell employees on April 21, 1993, at 666 NW 79th Avenue, Miami, Florida and on April 26 and 27, 1993 at 903 West University Avenue, Gainesville, 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: Roger Lewis Marchant, Robert Joseph Ryan, Christy Westin, Earl Thomas Pickering, Robert T. Lovett, Levete Fail, Charles Dwayne Caldwell, Howard T. Adams, Jr., Billie Crumpton Sommer, L. E.

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"Van" Warner, Tom Flowers, Steven Barry, Gregory Bruce Hart, Barbara Combs, Helen Hill, Patricia H. Travis, Joanne Norris, Robert C. Lockward, Harold E. Stephens, Geraldine H. Littles, Patricia O. Murphy, Gregory Keith Berman, and Dudley C. Staley, III.

2. Some of the information contained in the 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, <u>per se</u>, confidential pursuant to Section 364.183(f), Florida Statues, 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, <u>per se</u>, confidential under Section 364.183(f), Florida Statutes.

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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 Staff Notice of Deposition is attached hereto.

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Respectfully submitted this 21st Day of May, 1993.

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

HARRIS R. ANTHONY 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

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

) DOCKET NO. 910163-TL
integrity of SOUTHERN BELL)
) FILED: 04/16/93
COMPANY'S repair service)
activities and reports.)
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AMENDED NOTICE OF DEPOSITION

TO: Harris R. Anthony c/o Marshall M. Criser, III 150 South Monroe Street Suite 400 Tallahassee, Florida 32301

NOTICE is hereby given that the Staff of the Florida Public Service Commission will take the depositions of the following named individuals at 666 N.W. 79th Avenue, Miami, Florida, beginning Monday April 19, 1993 at 9:30 a.m. and continuing through Wednesday April 20, 1993 at 5:00 p.m.:

Monday April 19, 1993 Room 640

9:30 am Faller, John E. 10:30 am Thomas, Nadine 11:15 am Chasteen, Charlie D. 1:00 pm Edwards, Diane F. 1:45 pm Moran, Patricia A. 2:30 pm Booker, Hampton G. 3:30 pm Minus, Kathleen D. 4:15 pm Brent, Wanda S. 5:00 pm Bourne, Clyde C.

Tuesday April 20, 1993 Room 642

8:00 am	Howarth, Dorothy R.
08:45 am	Bates, Ronald P.
09:30 am	Farmer, Laura D.
10:30 am	Henry, Eileen M.
11:15 am	Parker, Shirley V.
1:00 pm	Robinson, Susie R.
1:45 pm	Cole, Susan
2:30 pm	Gray, Marjorie S.
3:30 pm	Marquis, Douglas D.
4:15 pm	Kassim, Raymond R.
5:00 pm	Luber, Edward V.

HQ RE(ULATOR:	Y-ATLA
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NOTICE OF DEPOSITION DOCKET NO. 910163-TL PAGE 2

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Wednesday April 21, 1993 Room 640

8:00 am Littles, Geraldine H. 8:45 am Sanches, Dinah D. 9:30 am Shanaver, Frances T. 10:30 am Matthews, Kenneth R. 11:15 am Hernandez, Carmen 1:00 pm Seiler, John W. 1:45 pm Berman, Gregory K. 2:30 pm Staley, Dudley C. 3:30 pm Murphy, Patricia O. 4:15 pm Stephens, Harold E. 5:00 pm Andrade, Eduardo

This deposition is being taken for purposes of discovery, for use at trial, or for any other purpose allowed under the Florida Rules of Civil Procedure and the Rules of the Florida Public Service Commission.

Please govern yourselves accordingly.

WILSON JEAN

counsel Staf

FLORIDA PUBLIC SERVICE COMMISSION 101 East Gaines Street Fletcher Building - Room 226 Tallahassee, Florida 32399-0863 (904) 487-2740

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the) DOCKET NO. 910163-TL integrity of SOUTHERN BELL) TELEPHONE AND TELEGRAPH) ISSUED: 04/16/93 COMPANY'S repair service) activities and reports.)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and copies of STAFF'S <u>AMENDED NOTICE OF DEPOSITION</u> TO SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY have been furnished by U.S. Mail this <u>16th</u> day of <u>April</u>, <u>1993</u> to the following:

Harris R. Anthony J. Phillip Carver R. Douglas Lackey Southern Bell Telephone and Telegraph Company C/O Marshall M. Criser, III 150 S. Monroe Street Suite 400 Tallahassee, FL 32301

Michael B. Twomey Assistant Attorney General Department of Legal Affairs Room 1603, The Capitol Tallahassee, FL 32399-1050

Michael W. Tye AT&T Communications of the Southern States, Inc. 106 East College Avenue Suite 400 Tallahassee, FL 32301 Charles J. Beck J. Sue Richardson Office of Public Counsel c/o The Florida Legislature 111 W. Madison Street Room 812 Tallahassee, FL 32399-1400

David M. Wells Robert J. Winicki William S. Graessle Mahoney, Adams & Criser 3300 Barnett Center 50 North Laura Street P.O. Box 4099 Jacksonville, FL 32201

JEAN WILSON R Staff Counsel

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

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05-21-93 02:51PM FROM BELLSOUTH LEGAL-FLA

TO 19042228640

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

) DOCKET NO. 910163-TL In re: Investigation into the integrity of SOUTHERN BELL TELEPHONE AND TELEGRAPH FILED: 04/14/93 COMPANY'S repair service activities and reports.

NOTICE OF DEPOSITION

Harris R. Anthony TO: c/o Marshall N. Criser, III 150 South Monroe Street Suite 400 Tallahassee, Florida 32301

NOTICE is hereby given that the Staff of the Florida Public Service Commission will take the depositions of the following named individuals at 903 West University Avenue in the second floor conference room, Gainesville, Florida, beginning Monday April 26, 1993 at 8:00 a.m. and continuing through Tuesday April 27, 1993:

Monday April 26, 1993	Tuesday April 27, 1993
8:00 am Swilley, Gary H.	8:00 am Westin, Christy
8:45 am Adams, Howard T.	8:45 am Caldwell, Charles D.
9:30 am Pickering, Earle T.	9:30 am Combs, Barbara C.
10:30 am Warner, "Van" L. E.	10:30 an Flowers, Thomas M.
11:15 am Thomas, Tara R.	11:15 am Lovett, Robert T.
1:00 pm Barry, Steve, J.	1:00 pm Fail, Levete L.
1:45 pm Marchant, Roger L.	1:45 pm Hart, Gregory B.
2:30 pm Sommer, Billie C.	2:30 pm Ryan, Robert J.
3:30 pm Travis, Patricia H.	3:30 pm Lockward, Robert C.
4:15 pm Norris, Joanne	4:15 pm Hill, Helen J.

This deposition is being taken for purposes of discovery, for use at trial, or for any other purpose allowed under the Florida Rules of Civil Procedure and the Rules of the Florida Public Service Commission.

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NOTICE OF DEPOSITION DOCKET NO. 910163-TL PAGE 2

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Please govern yourselves accordingly.

JEAN R. WILSON Staff Counsel

FLORIDA PUBLIC SERVICE COMMISSION 101 East Gaines Street Fletcher Building - Room 226 Tallahassee, Florida 32399-0863 (904) 487-2740

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05-21-93 02:51FM FROM BELLSOUTH LEGAL-FLA TO 19042228640

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the integrity of SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S repair service activities and reports.

) DOCKET NO. 910163-TL

ISSUED: 04/14/93

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and copies of STAFF'S NOTICE OF DEPOSITION TO SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY have been furnished by U.S. Mail this 14th day of April, 1993 to the following:

Harris R. Anthony J. Phillip Carver R. Douglas Lackey Southern Bell Telephone and Telegraph Company c/o Marshall M. Criser, III 150 S. Monroe Street Suite 400 Tallahassee, FL 32301

Michael B. Twomey Assistant Attorney General Department of Legal Affairs Room 1603, The Capitol Tallahassee, FL 32399-1050

Michael W. Tye ATET Communications of the Southern States, Inc. 106 Bast College Avenue Suite 400 Tallahassee, FL 32301

Charles J. Beck J. Sue Richardson Office of Public Counsel c/o The Florida Legislature 111 W. Madison Street Room 812 Tallahassee, FL 32399-1400

David M. Wells Robert J. Winicki William S. Graessle Mahoney, Adams & Criser 3300 Barnett Center 50 North Laura Street P.O. Box 4099 Jacksonville, FL 32201

can R. W JEAN R. WILSON Staff Counsel

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

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