

SCANNED

J. Phillip Carver  
General Attorney

ORIGINAL  
FILE COPY

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 11, 1993

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

Re: Docket No. 900960-TL 920260-TV

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Notice of Intent to Request 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 \_\_\_\_\_
- AFA 2 \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 1 \_\_\_\_\_
- LIN 6 \_\_\_\_\_
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1 \_\_\_\_\_
- WAS \_\_\_\_\_

Enclosures

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

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

RECEIVED & FILED  
*ms*  
EPSC-BUREAU OF RECORDS

A BELLSOUTH Company

DOCUMENT NUMBER-DATE  
10874 OCT 11 1993

FLORIDA PUBLIC SERVICE COMMISSION

**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 *11<sup>th</sup>* day of *Oct.*, 1993

to:

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

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Office of the Public Counsel  
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Florida Public Svc. Commission  
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Florida Pay Telephone  
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c/o Mr. Lance C. Norris  
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Stan Greer  
Division of Communications  
Florida Public Svc. Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0863

J. Phillip Carver (PW)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Show cause proceeding ) Docket No. 900960-TL  
against Southern Bell Telephone )  
and Telegraph Company for )  
misbilling customers. )  
\_\_\_\_\_ ) Filed: October 11, 1993

**SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
NOTICE OF INTENT TO REQUEST 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 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 August 30 through September 2, 1993 in Jacksonville, Gainesville, Daytona Beach, Merritt Island, and Fort Pierce, Florida. The depositions of Southern Bell employees Martha Powell and Elizabeth McKenzie, which were taken on September 1, 1993, in Daytona Beach, Florida, have been transcribed and were received by Southern Bell on October 11, 1993.

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 this information contains proprietary information, Southern Bell is filing this Notice of Intent to Request 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 is attached hereto.

Respectfully submitted this 11th day of October, 1993.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY

*Harris R. Anthony*

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

*R. Douglas Lackey (BW)*

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Show Cause proceeding against )  
Southern Bell Telephone and Telegraph )  
Company for misbilling customers )

Docket No. 900960-TL  
Filed: August 16, 1993

NOTICE OF DEPOSITIONS

Pursuant to Florida Rule of Civil Procedure 1.310, notice is provided that the Citizens of Florida, by and through Jack Shreve, Public Counsel, will take the sworn deposition upon oral examination of Shelba Hartley, Aida Stewart, Carol Muller, Emma Evans, Cindi Booth, Dottie Cruse, Greg Mathis, Betty Buchanon, Sara Brown, Shirley Williams, Elizabeth McKenzie, Martha Powell, Marlene Hughes, Gloria Healey, Dorothy Hall, Linda Hunt, Marsha Stewart, Nancy, Gorniewicz, Donna Johnson and Wanda Futch for purposes of discovery and such other purposes as are permitted by the Florida Rules of Civil Procedure.

The deposition will be taken at the following time and place:

Jacksonville

Monday, August 30, 1993  
301 West Bay Street, 20th Floor Conference Room C  
Pre-deposition meeting in Conference Room B

09:00 a.m. Hartley, Shelba  
10:00 a.m. Stewart, Aida  
11:00 a.m. Muller, Carol  
01:00 p.m. Evans, Emma  
02:00 p.m. Booth, Cindi

**RECEIVED**  
AUG 17 1993

1 HQ REGULATORY-ATLA  
MIAMI LEGAL  
AML  
U.S. MAIL & REG. RELATIONS  
TALLAHASSEE, FL  
FAX \_\_\_\_\_ PER 1.1

Gainesville

Tuesday, August 31, 1993  
903 West University Avenue/1st Floor Conference Room  
Pre-deposition meeting in Mr. Christian's 2nd Floor  
Conference Room

09:00 a.m. Cruse, Dottie  
10:00 a.m. Mathis, Greg  
11:00 a.m. Buchanon, Betty  
01:00 p.m. Brown, Sara  
02:00 p.m. Williams, Shirley

Daytona Beach

Wednesday, September 1, 1993  
900 North Nova Road/1st Floor Conference Room  
Pre-deposition check with Wayne Tubaugh in Gloria  
Hart's office

09:00 a.m. McKenzie, Elizabeth  
10:00 a.m. Powell, Martha

Merritt Island

Wednesday, September 1, 1993  
255 North Sykas Creek Parkway/2nd Floor Conference Rm  
Pre-deposition check with Wayne Tubaugh in Ms.  
Bergdoll's office

01:30 p.m. Hughes, Marlene  
02:30 p.m. Healey, Gloria

Fort Pierce

Thursday, September 2, 1993  
3300 Okeechobee Rd./Rm 182 First Floor Conference Rm  
Pre-deposition check with Wayne Tubaugh in Ms.  
McCarthy's office

09:00 a.m. Hall, Dorothy  
10:00 a.m. Hunt, Linda



Fort Pierce (cont.)

11:00 a.m.      Stewart, Marsha  
01:00 p.m.      Gorniewicz, Nancy  
02:00 p.m.      Johnson, Donna  
03:00 p.m.      Futch, Wanda

Dated this 16th day of August, 1993.

*Charles J. Beck*  
Charles J. Beck  
Deputy Public Counsel

Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street  
Room 812  
Tallahassee, FL 32399-1400  
(904) 488-9330

Attorney for the Citizens  
of the State of Florida