

dy

NANCY B. WHITE
General Attorney

150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(404) 529-5387

May 15, 1992

**ORIGINAL
FILE COPY**

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

RE: Docket No. 920260-TL

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 above-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 on the parties shown on the attached Certificate of Service.

Sincerely yours,

Nancy B. White
Nancy B. White
(2)

Enclosures

cc: All Parties of Record
A. M. Lombardo
H. R. Anthony
R. D. Lackey

ACK	_____
FA	<u>4</u>
TP	_____
ST	_____
SI	_____
SR	_____
SO	_____
SS	<u>1</u>
SW	<u>10</u>
SP	_____
ST	_____

RECEIVED & FILED
TB
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
04938 MAY 15 1992
TH Kay
FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 920260-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 15th day of May, 1992 to:

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

Charles J. Beck
Deputy Public Counsel
Office of the Public Counsel
111 W. Madison Street
Room 812
Tallahassee, FL 32399-1400

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

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Grandoff and Reeves
522 East Park Avenue, Suite 200
Tallahassee, Florida 32301

Joseph P. Gillan
J. P. Gillan and Associates
Post Office Box 541038
Orlando, Florida 32854-1038

Nancy B. White
(af)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of) Docket No. 920260-TL
the Revenue Requirements and Rate)
Stabilization Plan of Southern) Filed: May 15, 1992
Bell Telephone and Telegraph)
Company (Formerly FPSC Docket)
Number 880069-TL))
)

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 files its Notice of Intent to Request Specified Confidential Classification.

1.

The Staff of the Florida Public Service Commission ("Staff") has issued six Audit Requests in the above-captioned docket, requesting, among other things, that Southern Bell make available for viewing the following information:

Audit Request No. 1 - Board of Directors minutes for 1990 and 1991 and workpapers of external auditors (Coopers & Lybrand) for 1990 and 1991.

Audit Request No. 2 - Internal audits for 1990 and 1991.

2.

Some of the information to be reviewed by the Staff is clearly proprietary. The Board of Directors minutes contain information relating to every facet of Southern Bell's business, including its competitive interests. Any competitor or potential competitor of Southern Bell's non-regulated services would desire this information to allow the targeting of lucrative markets. If

DOCUMENT NUMBER-DATE

04938 MAY 15 1992

FPSC-RECORDS/REPORTING


this were to occur, Southern Bell's revenues could well be diminished which would work to the ultimate detriment of Southern Bell's ratepayers. In addition, internal audit reports are protected by § 364.183(3)(b), Florida Statutes, which states that "proprietary confidential business information" includes "reports of internal auditors."

3.

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 review this information 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 Request is attached hereto.

Respectfully submitted this 15th day of May, 1992.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY


HARRIS R. ANTHONY (22)
PHILLIP J. CARVER
c/o Marshall M. Criser, III
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(305) 530-5555

[SIGNATURES CONTINUED ON NEXT PAGE]



R. DOUGLAS LACKEY

NANCY B. WHITE

675 West Peachtree Street, N.E.

Room 4300 Southern Bell Center

Atlanta, Georgia 30375

(404) 529-3862

(404) 529-5387

(Please Use Ball Point Pen - Press Hard)

FLORIDA PUBLIC SERVICE COMMISSION
DOCUMENT / RECORD REQUEST

TO: AL CARRERAS
UTILITY: Southern Bell
FROM: GABRIELA LEON
(AUDIT MANAGER)

(AUDITOR PREPARING REQUEST)

REQUEST NUMBER: 1
AUDIT PURPOSE: RATE CASE

DATE OF REQUEST: 1/27/92

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY (ASAP)
(DATE)

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE:

ITEM DESCRIPTION:

- INCIDENT TO AN INQUIRY
- OUTSIDE OF AN INQUIRY

- 1) Please provide plant tour for all PEC Auditors, of plant from the telephone line through the system. MARCH
- 2) Please provide tour for all auditors, of company system from telephone call through billing to the general ledger and of payroll, accounts payable, construction, etc. MARCH
- 3) Please provide the board of Directors minutes for review. 1990, 1991
- 4) Please provide the external auditors work-papers for review. 1990, 1991 (INCLUDES CAM)

TO: AUDIT MANAGER _____ DATE _____

THE REQUESTED RECORD OR DOCUMENTATION:

- (1) HAS BEEN PROVIDED TODAY
- (2) CANNOT BE PROVIDED IN THREE (3) WORK DAYS BUT WILL BE MADE AVAILABLE BY _____
- (3) AND IN MY OPINION THIS MATERIAL IS PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156, F.S. I UNDERSTAND THAT TO OBTAIN TEMPORARY CONFIDENTIAL HANDLING A NOTICE OF INTENT MUST BE FILED WITH THE DIVISION OF RECORDS AND REPORTING. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE COMMISSION STAFF HAS OBTAINED THE MATERIAL (OR IN THE CASE OF MATERIAL OBTAINED DURING THE COURSE OF AN AUDIT, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE) FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF RECORDS AND REPORTING, REFER TO RULE 25-22.006 F.A.C.
- (4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

SIGNATURE AND TITLE OF RESPONDENT

DISTRIBUTION:

Original: Utility Complete and Return to Auditor Pink: To FPSC Analyst Goldenrod: Audit File Copy Canary: Utility Retain
PSC/AFA-3 (Rev. 7/90)

(Please Use Ball Point Pen - Press Hard)

FLORIDA PUBLIC SERVICE COMMISSION
DOCUMENT / RECORD REQUEST

TO: AL CARRERAS
UTILITY: Southern Bell
FROM: GABRIELA LEON
(AUDIT MANAGER)

(AUDITOR PREPARING REQUEST)

REQUEST NUMBER: 2
AUDIT PURPOSE: RATE CASE

DATE OF REQUEST: 1/27/92

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY (ASAP)
(DATE)

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE:

INCIDENT TO AN INQUIRY
 OUTSIDE OF AN INQUIRY

ITEM DESCRIPTION:

1) Please provide internal audits for review, 1990, 1991
FLORIDA, SOUTHERN BELL, BSS

TO: AUDIT MANAGER _____ DATE _____

THE REQUESTED RECORD OR DOCUMENTATION:

- (1) HAS BEEN PROVIDED TODAY
- (2) CANNOT BE PROVIDED IN THREE (3) WORK DAYS BUT WILL BE MADE AVAILABLE BY _____
- (3) AND IN MY OPINION THIS MATERIAL IS PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156, F.S. I UNDERSTAND THAT TO OBTAIN TEMPORARY CONFIDENTIAL HANDLING A NOTICE OF INTENT MUST BE FILED WITH THE DIVISION OF RECORDS AND REPORTING. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE COMMISSION STAFF HAS OBTAINED THE MATERIAL (OR IN THE CASE OF MATERIAL OBTAINED DURING THE COURSE OF AN AUDIT, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE) FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF RECORDS AND REPORTING, REFER TO RULE 25-22.006 F.A.C.
- (4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

SIGNATURE AND TITLE OF RESPONDENT

DISTRIBUTION:

Original: Utility Complete and Return to Auditor Pink: To FPSC Analyst Goldenrod: Audit File Copy Canary: Utility Retain