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June 5, 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. 910163-TL - Repair Service Investigation

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Response and Objections to Staff's Fifteenth Request for Production of Documents dated May 1, 1992, and its Notice of Intent to Seek Confidential Treatment, which we ask that you file in the captioned docket.

ACK _____
AFA _____
APP _____

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.

CAF _____
CMU _____
CTR _____

Sincerely yours,
J. Phillip Carver (JPC)
J. Phillip Carver

EAG _____
LEG 1 _____
LIN 6 _____

Enclosures

OPC _____
RCH _____

SEC 1 cc: All Parties of Record
Harris R. Anthony
WAS _____ A. M. Lombardo
OTH _____ R. Douglas Lackey

RECEIVED & FILED

JPC
FPSC-BUREAU OF RECORDS

A BELL SOUTH Company

DOCUMENT NUMBER-DATE
05860 JUN-5 1992
FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 910163-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 5th day of June , 1992,
to:

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

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

J. Phillip Conner (of)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition on behalf of Citizens) Docket No. 910163-TL
of the State of Florida to initiate)
investigation into integrity of) Filed: June 5, 1992
Southern Bell Telephone and Telegraph)
Company's repair service activities)
and reports.)
_____)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
RESPONSES AND OBJECTIONS TO STAFF'S FIFTEENTH
REQUEST FOR PRODUCTION OF DOCUMENTS
AND NOTICE OF INTENT TO SEEK CONFIDENTIAL TREATMENT

COMES NOW, BellSouth Telecommunications, Inc. doing business as Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company") and files (1) pursuant to Rule 25-22.034, Florida Administrative Code, and Rules 1.280(c) and 1.350 of the Florida Rules of Civil Procedure, its Response and Objections to the Florida Public Service Commission Staff's ("Staff") Fifteenth Request for Production of Documents dated May 1, 1992, and (2) pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, its Notice of Intent to Seek Confidential Treatment.

GENERAL RESPONSE AND OBJECTIONS

1. Some of the documents that will be delivered to and reviewed by Staff contain information that is exempt from disclosure pursuant to Section 119.07, Florida Statutes or that constitutes confidential proprietary business information pursuant to Section 364.183(3), Florida Statutes. A number of the documents contain customer specific information that is exempted from the Open Records Act by Section 119.07(3)(w), Florida Statutes. Other documents contain Southern Bell

DOCUMENT NUMBER-DATE

05860 JUN-5 1992

FPSC-RECORDS/REPORTING

employees' social security numbers, which constitute confidential proprietary business information pursuant to Section 364.183(3), Florida Statutes. Thus, pursuant to the Commission's rule on confidentiality, Rule 25-22.006(3)(a), Florida Administrative Code, Southern Bell hereby gives notice of its intent to seek confidential treatment. The proprietary information in question is furnished in response to Request Nos. 3 and 10. Documents produced in response to Request No. 3 contain customer specific information and is, therefore exempt, from disclosure pursuant to Section 119.07(3)(w), Florida Statutes. Documents produced in response to Request No. 10 contain Southern Bell employees' social security numbers and, therefore, constitute confidential proprietary business information pursuant to Section 364.183(3), Florida Statutes.

2. Southern Bell does not believe it was Staff's intention to require Southern Bell to produce the same documents previously or contemporaneously produced in this or other dockets, but to the extent Staff did so intend, Southern Bell objects on the basis that such a request would be unduly burdensome, oppressive, and unnecessary.

3. In each instance in which Southern Bell agrees to produce documents in response to a specific request, the responsive documents will be produced for inspection and copying at a mutually agreeable time and place.

SPECIFIC RESPONSES

4. Subject to the general objections, each of which is incorporated by reference into the specific responses made herein, Southern Bell responds to the individual numbered requests as follows:

A. In response to Request No. 1, Southern Bell will produce the document responsive to this request.

B. In response to Request No. 2, Southern Bell objects to the production of the September 19, 1991 MOOSA Audit. The Audit was performed through, and at the direction of, counsel for Southern Bell and, therefore, constitutes attorney-client privileged material or, in the alternative, constitutes attorney work product.

C. In response to Request No. 3, Southern Bell states that the MP-2312 report is utilized to verify billing and credits applied to Southern Bell customer accounts. Prior to November 1991, the MP-2312 report contained only two parts. Part one of the MP-2312 report lists a sample of services ordered by customers during a certain bill period and the corresponding service orders for those services. Part one of the report primarily selects the criteria for use in Part two. Part two of the MP-2312 report lists the service orders and corresponding account numbers for the service criteria selected in Part one of the report. The Billing Verification Group in Comptrollers utilizes the MP-2312 report to verify from a sample of service

orders that service order to customer account billing flow is functioning correctly. In November of 1991, Southern Bell added Part three to the MP-2312 report. Part three contains a sampling of accounts which were to receive a out-of-service credit from the mechanized system. The Billing Verification Group in Comptrollers utilizes this part of the MP-2312 report to verify the inclusion of the out-of-service credits on a representative sample of customers' accounts. Southern Bell will produce one complete MP-2312 report, including all parts and all Part three MP-2312 reports in its custody and control, subject to its Notice of Intent to Seek Confidential Treatment contained herein. The MP-2312 report has no retention period under Southern Bell document retention guidelines, however the Florida department that exercises custody and control of these documents retains them for 60 days.

D. In response to Request No. 4, Southern Bell will produce the documents responsive to this request.

E. In response to Request No. 5, Southern Bell will produce the documents responsive to this request.

F. In response to Request No. 6, Southern Bell will produce the documents responsive to this request.

G. In response to Request No. 7, Southern Bell will produce all TREAT reports pertaining to Public Service Commission results that have not been previously provided to Staff.

H. In response to Request No. 8, Southern Bell will produce the documents responsive to this request.

I. In response to Request No. 9, Southern Bell does not have in its possession the document responsive to this request.

J. In response to Request No. 10, Southern Bell will produce the documents responsive to this request subject to its Notice of Intent to Seek Confidential Treatment contained herein.

Respectfully submitted,

ATTORNEYS FOR SOUTHERN BELL
TELEPHONE AND TELEGRAPH COMPANY

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