

J. Phillip Carver
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Southern Bell Telephone
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Phone (305) 530-5558

November 23, 1992

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 Filing Amendatory Page, 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 Carver
J. Phillip Carver of

ACK ✓ _____
AFA _____
APP _____
CAF _____

CM Enclosures

CTR _____ cc: All Parties of Record
EPA _____ A. M. Lombardo
LEA 1 _____ H. R. Anthony
LHA 6 _____ R. Douglas Lackey
CPS _____
RCS _____
SES 1 _____
WAS _____
OTH _____

X-ref DN 13617-92

DOCUMENT NUMBER-DATE

13772 NOV 23 1992

FPSC-RECORDS/REPORTING

A BELL SOUTH Company

CERTIFICATE OF SERVICE
Docket No. 910163-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 23rd day of November, 1992,
to:

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

Tracy Hatch
Division of Legal Services
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0863

J. Phillip Conner PJ

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition on behalf of) Docket No. 910163-TL
Citizens of the State of Florida)
to initiate investigation into) Filed: November 23, 1992
integrity of Southern Bell)
Telephone and Telegraph Company's)
repair service activities and)
reports.)
_____)

**SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
NOTICE OF FILING AMENDATORY PAGE**

COMES NOW BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph ("Southern Bell" or "Company"), by and through its attorneys, and hereby gives notice of the filing of the attached amendatory page, and states as grounds in support thereof the following:

1. Page 4, paragraph 5 of Southern Bell Telephone and Telegraph Company's Response and Memorandum in Opposition to Public Counsel's Motion for Review of Order Establishing Procedure, filed November 18, 1992, contains a typographical error. Specifically, in the third line of that paragraph there is a reference to the date "February 1, 1992." The correct date is "February 1, 1993." Attached to this notice is an amendatory page, which contains the correct date.

DOCUMENT NUMBER-DATE
13772 NOV 23 1992
FPSC-RECORDS/REPORTS

WHEREFORE, Southern Bell respectfully requests that page be substituted for the corresponding page that was originally filed.

Respectfully submitted,

ATTORNEYS FOR SOUTHERN BELL
TELEPHONE AND TELEGRAPH COMPANY

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5. The lack of prejudice to Public Counsel is also evident in the fact that the Order that Public Counsel protests does not require testimony to be filed until February 1, 1993. Although Public Counsel complains vehemently that it has suffered some prejudice as a result of what it calls the "failure of the Commission to make timely rulings on motions to compel," it provides no example of this prejudice. Given the fact that testimony is not due for another two and one half months, it is easy to understand why Public Counsel lists no examples to support its claim of prejudice. In reality, there are no such examples. Furthermore, Public Counsel can no longer argue that it must have the information subject to the discovery disputes for purposes of the hearings scheduled in Docket No. 920260-TL in January and February. By Order No. PSC-92-1320-PCO-TL, Commissioner Clark acting as the Prehearing Officer in that docket, has ruled that evidence relating to Docket Nos. 900960-TL, 910163-TL and 920727-TL will not be heard until April. Thus, Public Counsel has not in any way been prejudiced.

6. Moreover, Public Counsel is largely responsible for the situation of which it complains. Less than one week ago Public Counsel served on Southern Bell yet another Motion to Compel that again raises attorney-client privilege and work product issues. At the same time, Public Counsel continues to propound new