

JACK SHREVE PUBLIC COUNSEL

STATE OF FLORIDA

OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, Florida 32399-1400 904-488-9330

December 11, 1992

FPSC-RECORDS/REPORTING

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 - Rate Stabilization and 910163-TL - Repair and Rebate

Dear Mr. Tribble:

Enclosed please find three copies of Public Counsel's Notice of Deposition Upon Oral Examination, which we ask you to file in these dockets. The original and one copy have been served on Southern Bell Telephone and Telegraph Company by mail on this date.

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.

ACK	Sincerely yours,
PTA 1	Janos Su Vickards -
CAR	Janis Sue Richardson Associate Public Counsel
Enclosures	
cc: All Parties of Record	
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition on behalf of Citizens of the State of Florida to Initiate Investigation into the Integrity of Southern Bell Telephone and Telegraph Company's Repair Service Activities and Reports.

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Docket No. 910163-TL

Comprehensive Review of the Revenue Requirements and Rate Stabilization Plan of Southern Bell Telephone & Telegraph Company

Docket No. 920260-TL

Filed: December 11, 1992

NOTICE OF DEPOSITION UPON ORAL EXAMINATION

TO: Harris R. Anthony, Esq. c/o Marshall M. Criser III 150 S. Monroe Street Tallahassee, FL 32301

NOTICE is hereby given that, pursuant to Florida Rule of Civil Procedure 1.310(b)(6), the Citizens of Florida, by and through Jack Shreve, Public Counsel, will take the sworn deposition of Ms. Etta Martin and Mr. Dan L. King. The deposition will be conducted as a panel.

The deposition, which is for the purpose of discovery and such other purposes as are permitted by the Florida Rules of Civil Procedure, will cover the repair and rebate systems, service quality, and any other matters related to the issues in this docket.

The deposition is scheduled at the following location and time indicated:

Tuesday, January 12, 1993 at 9:00 a.m. BellSouth Telecommunications, Inc. Headquarters 3535 Colonnade Parkway, Room 3B Birmingham, Alabama 35243

The company has provided the name and number of Linda Katz, 205/977-5150, for purposes of security clearance into the building.

Dated this 11th day of December 1992.

JANIS SUE RICHARDSON Associate Public Counsel

Office of Public Counsel c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, Florida 32399-1400

(904) 488-9330

Attorney for the Citizens of the State of Florida

CERTIFICATE OF SERVICE Docket No. 910163-TL

I HEREBY CERTIFY that the attached NOTICE OF DEPOSITION UPON ORAL EXAMINATION has been served by U.S. Mail or hand-delivery, this 11th day of December, 1992 to the following:

Harris R. Anthony, Esq.
BellSouth Telecommunications, Inc.
d/b/a/ Southern Bell Telephone
& Telegraph Company
c/o Marshall M. Criser, III
150 S. Monroe Street, Suite 400
Tallahassee, Florida 32301

Tracy Hatch, Esq.
Jean Wilson, Esq.
Division of Legal Services
Fla. Public Service Commission
101 East Gaines Street
Tallahassee, FL 32301

John Hoag, Esq.
Department of Legal Affairs
Presidential Circle
4000 Hollywood Ave.
5th Fl., Rm. 10
Hollywood, FL 33021

JANIS SUE RICHARDSON
Associate Public Counsel

Office of the Public Counsel 111 West Madison Street Room 812 Tallahassee, FL 32399-1400

CERTIFICATE OF SERVICE DOCKET NO. 920260-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail or hand-delivery to the following parties on this 11th day of December, 1992.

Marshall Criser, III
BellSouth Telecommunications,
Inc. (Southern Bell Telephone & Telegraph Company)
150 S. Monroe St., Suite 400
Tallahassee, FL 32301

. . .

Harris B. Anthony
BellSouth Telecommunications,
Inc. (Southern Bell Telephone & Telegraph Company)
150 W. Flagler St., Suite 1910
Miami, FL 33130

Robin Norton
Division of Communications
Fla. Public Service Commission
101 East Gaines Street
Tallahassee, FL 32301

Doug Lackey
BellSouth Telecommunications,
Inc. (Southern Bell Telephone & Telegraph Company)
4300 Southern Bell Center
Atlanta, GA 30375

Mike Twomey Department of Legal Affairs Attorney General The Capitol Bldg., 16th Floor Tallahassee, FL 32399-1050

Laura L. Wilson
Messer, Vickers, Caparello,
Madsen & Lewis, P.A.
P.O. Box 1876
Tallahassee, FL 32302-1876

Angela Green
Division of Legal Services
Fla. Public Service Commission
101 East Gaines Street
Tallahassee, FL 32301

Edward Paschall Florida AARP Capital City Task Force 1923 Atapha Nene Tallahassee, FL 32301

The American Association of Retired Persons c/o Bill L. Bryant, Jr. Foley & Lardner 215 S. Monroe St., Suite 450 P.O. Box 508 Tallahassee, FL 32302-0508

Richard D. Melson Hopping, Boyd, Green & Sams 23 South Calhoun Street P.O. Box 6526 Tallahassee, FL 32314

Michael J. Henry MCI Telecommunications Corp. MCI Center Three Ravinia Drive Atlanta, GA 30346

Lance C. Norris, President Florida Pay Telephone Assn., Inc. 8130 Baymeadows Circle, West Suite 202 Jacksonville, FL 32256 Joseph A. McGolthlin Vicki Gordon Kaufman McWhirter, Grandoff & Reeves 522 E. Park Ave., Suite 200 Tallahassee, FL 32301

نها قد

Rick Wright AFAD Fla. Public Service Commission 101 East Gaines Street Tallahassee, FL 32301

Peter M. Dunbar Haben, Culpepper, Dunbar & French, P.A. 306 N. Monroe St. P.O. Box 10095 Tallahassee, FL 32301

Patrick K. Wiggins Wiggins & Villacorta, P.A. P.O. Drawer 1657 Tallahassee, FL 32302

Dan B. Hendrickson P.O. Box 1201 Tallahassee, FL 32302

Monte Belote Florida Consumer Action Network 4100 W. Kennedy Blvd., #128 Tampa, FL 33609

Cecil O. Simpson, Jr.
Peter Q. Nyce, Jr.
Regulatory Law Office
Office of the Judge Advocate
General
Department of the Army
901 North Stuart St.
Arlington, VA 22203-1837

Joseph P. Gillan J. P. Gillan and Associates P.O. Box 541038 Orlando, FL 32854-1038

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs, Odom & Ervin
305 S. Gadsden Street
P.O. Drawer 1170
Tallahassee, FL 32302

Chanthina R. Bryant Sprint 3065 Cumberland Circle Atlanta, GA 30339

Michael W. Tye
AT&T Communications of the
Southern States, Inc.
106 East College Avenue
Suite 1410
Tallahassee, FL 32301

Florida Hotel and Motel Assn. c/o Thomas F. Woods Gatlin, Woods, Carlson & Cowdery 1709-D Mahan Drive Tallahassee, FL 32308

Douglas S. Metcalf Communications Consultants, Inc. 1600 E. Amelia St. Orlando, FL 32803-5505

Benjamin H. Dickens, Jr.
Blooston, Mordkofsky, Jackson & Dickens
2120 L Street., N.W.
Washington, DC 20037

Janis Sue Richardson
Associate Public Counsel