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January 22, 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. 910163-TL

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Request for Confidential Classification for Southern Bell's responses to Item Nos. 102, 103, and 104 of Staff's Seventh Set of Interrogatories 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,

Sidney J. White, Jr.
Sidney J. White, Jr. (2)

Enclosures

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

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CERTIFICATE OF SERVICE
Docket No. 910163-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this 22nd day of January, 1993 to:

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

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

Sidney J. White, Jr.
(2)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition on Behalf of)
Citizens of the State of Florida) Docket No. 910163-TL
to Initiate Investigation into)
Integrity of Southern Bell) Filed: January 22, 1993
Telephone and Telegraph Company's)
Repair Service Activities and)
Reports.)
_____)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION

COMES NOW BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), pursuant to Rule 25-22.006, Florida Administrative Division Code, and files its Request for Confidential Classification for portions of certain Company responses to Staff's Seventh Set of Interrogatories.

1. Southern Bell is filing its Request for Confidential Classification for its responses to Interrogatory Item Nos. 102, 103, and 104, which contain certain proprietary confidential business information.
2. Southern Bell has appended to this Request for Confidential Classification as Attachment A a listing showing the location in the Interrogatory responses of the information designated by Southern Bell as confidential.
3. Appended hereto in an envelope designated as Attachment B are two edited copies of the Interrogatory responses with the confidential information deleted.
4. Attached as Attachment C is a sealed envelope containing a copy of the Interrogatory responses with the material which is

confidential and proprietary highlighted. Copies of Attachment C are not being served on the other parties in this proceeding.

5. Regarding Southern Bell's responses to Interrogatory Item Nos. 102, 103, and 104, these responses are entitled to confidential classification because they contain employee-specific information unrelated to compensation, duties, qualifications and responsibilities. Section 364.183, Florida Statutes, expressly considers this information to be proprietary confidential business information. These interrogatory responses contain the names of current and past employees who were disciplined as a result of Company internal investigations. These investigations were intended solely for internal purposes, and the resulting disciplinary matters relative to specific individuals should not be publicly disclosed. Southern Bell has consistently maintained this position in other instances in this docket (citation omitted). The behavior of disciplined individuals falls outside of acceptable duties and responsibilities, has nothing to do with their qualifications, and was unrelated to normal compensation matters. Thus the information contained in Southern Bell's responses to Item Nos. 102, 103, and 104, as more specifically described above, meets the statutory criteria, and should therefore be afforded confidential classification.

6. Southern Bell has treated and intends to continue to treat the material for which confidential classification is

sought as private, and this information has not been generally disclosed.

WHEREFORE, based on the foregoing, Southern Bell moves the Prehearing Officer to enter an order declaring the information described above and contained in the indicated portions of the attachments to be confidential proprietary business information, and thus not subject to public disclosure.

Respectfully submitted this 22nd day of January, 1993.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY

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ATTACHMENT A

FPSC DOCKET 910163-TLSTAFF'S 7TH SET OF INTERROGATORIES

JUSTIFICATION FOR CONFIDENTIALITY REQUEST

1. The confidential and proprietary information that is contained in this listing is all employee-personnel information that is not related to qualifications, duties, responsibilities or compensation. Accordingly, these documents are exempted from the Public Records Act by the express provisions of Section 364.183, Florida Statutes.

The following information identified by interrogatory item number, page and line numbers is considered confidential and proprietary:

<u>INTERROGATORY ITEM NO.</u>	<u>PAGE NO.</u>	<u>LINE NOS.</u>	<u>COLUMNS</u>	<u>REASONS PROPRIETARY</u>
102	1	11 - 38	ALL	1
	2	7 - 14	ALL	1
103	1	10 - 18	ALL	1
104	2	2 - 49	ALL	1
	3	2 - 49	ALL	1
	4	2 - 48	ALL	1
	5	2 - 56	ALL	1