

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

February 1, 1993

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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 and Rebate Investigation

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.

Sincerely yours,

Charles Beck

Charles J. Beck Deputy Public Counsel

ACK ____ AFA APP ____ CAF CMU / CTR / Enclosures EAG _____ All Parties of Record LEG LIN 0P0 _____ RCH ____ SEC / RECEIVED & FILED WAS ____ OTH _____ FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE 01219 FEB-18 FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition on behalf of CITIZENS) OF THE STATE OF FLORIDA to initiate) investigation into integrity of SOUTHERN) BELL TELEPHONE & TELEGRAPH COMPANY'S) repair service activities and reports.)

Docket No. 910163-TL February 1, 1993

NOTICE OF DEPOSITION UPON ORAL EXAMINATION

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

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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 BellSouth Telecommunications, Inc., for purposes of discovery and such other purposes as are permitted by the Florida Rules of Civil Procedure. The deposition will cover the authorship, creation, distribution, background, use, and purpose of a document entitled "Closing Repair Jobs," which is attached to this notice.

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

Friday, March 5 at 10:00 a.m. Office of Public Counsel 111 West Madison Street Room 812 Tallahassee, FL 32399-1400 (904) 488-9330

DOCUMENT NUMBER-DATE

01219 FEB-18 FPED-RECORDS/REPORTING

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Dated this 1st day of February, 1993.

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Beck Charlin Charles J. Beck

Deputy 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 and REQUEST FOR PRODUCTION OF DOCUMENTS AT DEPOSITION has been served by U.S. Mail or hand-delivery, this 1st day of February, 1993 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

John Hoag, Esq. Department of Legal Affairs Presidential Circle 4000 Hollywood Ave. 5th Fl., Rm. 10 Hollywood, FL 33021 Tracy Hatch, Esq. Jean Wilson, Esq. Division of Legal Services Fla. Public Service Commission 101 East Gaines Street Tallahassee, FL 32301

Charles "

Deputy Public Counsel Deputy Public Counsel

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