NANCY B. WHITE General Attorney

Southern Bell Telephone and Telegraph Company Suite 400 150 South Monroe Street Tallahassee, Florida 32301 (404) 529-5387



March 3, 1993

Mr. Steve C. Tribble Director, Division of Records and Reporting Florida Public Service Commission 101 East Gaines Street Tallahassee, Florida 32301

Docket Nos. 900960-TL, 910163-TL, 910727-TL, 920260-TL

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Request for Confidential Classification and Motion for a Permanent Protective Order which we ask that you file in the above-captioned dockets.

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,

Mancy B. White (4)

Enclosures

All Parties of Record

A. M. Lombardo

H. R. Anthony

R. D. Lackey

DOCUMENT NUMBER-DATE 02387 MAR-38 FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE Docket No. 920260-TL Docket No. 900960-TL Docket No. 910163-TL Docket No. 910727-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this 3rd day of March, 1993 to:

Robin Norton
Division of Communications
Florida Public Service
Commission
101 East Gaines Street
Tallahassee, FL 32399-0866

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

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

Many B. White

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of the Revenue Requirements and Rate Stabilization Plan of Southern Bell Telephone and Telegraph Company Docket No. 920260-TL

In re: Show cause proceeding against Southern Bell Telephone and Telegraph Company for misbilling customers

Docket No. 900960-TL

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

In re: Investigation into Southern Bell Telephone and Telegraph Company's compliance with Rule 25-4.110(2), F.A.C., Rebates Docket No. 910727-TL

Filed: March 3, 1993

# SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S REQUEST FOR CONFIDENTIAL CLASSIFICATION AND MOTION FOR A PERMANENT PROTECTIVE ORDER

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 Code, and Rules 1.280(c), Florida Rules of Civil Procedure, and files its Request for Confidential Classification and Motion for a Permanent Protective Order regarding production of document requests made by the Staff of the Florida Public Service Commission at the beginning of Docket No. 910163-TL and housed in boxes labeled "A" through "Z" at the Commission's Offices.

 During the course of this proceeding, Staff has conducted extensive discovery of Southern Bell. Documents have been delivered to Staff in response to Staff's requests for production of documents and interrogatories. Those documents were the subject of Motions for a Temporary Protective Order filed herein and consequently are currently treated by Staff as confidential materials.

- 2. Southern Bell herewith files its Request for Confidential Classification and its Motion for Permanent Protective Order for the information contained in the Staff's Requests for Production of Documents. Southern Bell has appended to this Request for Confidential Classification as Attachment "A" a listing of the location in the documents of the information designated by Southern Bell as confidential, together with a statement indicating why the material should be treated as confidential proprietary business information.
- 3. Appended hereto in an envelope designated as Attachment "B" are two copies of the documents with the confidential information deleted. Appended hereto in an envelope designated as Attachment "C" is a copy of the documents with the proprietary information highlighted.
- 4. The information deemed to be confidential by Southern Bell and identified in Attachment "A" contains several categories of proprietary information, each of which will be discussed herein.
- 5. The first category concerns customer-specific information, including name, address, and telephone number of subscribers. This information is entitled to confidential

classification, and the Commission has consistently protected such customer-specific information from public disclosure.

Moreover, § 119.07(3)(w) specifically provides that information such as customers' names, addresses, and telephone numbers are exempt from the inspection and examination provisions of the Public Record Act.

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- 6. The second category of information concerns employee personnel information, specifically, the social security numbers of employees. This information is clearly confidential and proprietary under Florida Statutes, § 364.183(f), which provides that "proprietary confidential business information" includes "employee personnel information unrelated to compensation, duties, qualifications, or responsibilities."
- 7. The four areas of employee personnel information that are not, per se, confidential pursuant to § 364.183(f), Florida Statutes, are compensation, duties, qualifications, and responsibilities of an employee. A common sense reading of this list, as well as a review of the definitions of these items as contained in Webster's Seventh New Collegiate Dictionary demonstrate that the names of employees in connection with discipline do not fit any of the exceptions and thus are, per se, confidential under § 364.183(f), Florida Statutes.
- 8. A review of these terms, in the context of §
  364.183(f), Florida Statutes, reveals their meaning.
  "Compensation" is the amount of money or other value that an employee is paid to perform his or her job duties. "Duties" are

the particular acts an employee is expected to perform as a part of his or her job. "Qualifications" are the skills, knowledge, and abilities needed to perform a particular job. Finally, "responsibilities" are those things that an employee is obliged to do as part of his or her job. These meanings are confirmed by the dictionary definition of these words. Webster's definitions of these terms are as follow:

A. Compensation - payment, wages.

- B. Duty the action required by one's position or occupation.
- C. Qualification something that qualifies; a condition that must be complied with.
- D. Responsibility the quality or state of being responsible.

Even a cursory reading of these commonly-understood definitions makes it clear that the social security number of an employee is not encompassed within any of the concepts or definitions set forth above. Thus, the social security numbers of employees do not relate to their compensation, duties, qualifications, or responsibilities.

9. The third category of proprietary information sought to be protected herein concerns proprietary confidential business information relating to Southern Bell's overall strategic views and planning. This information is highly proprietary inasmuch as it discloses Southern Bell's competitive and other environmental assessments and analyses as well as possible Company responses as a result of consideration of such analyses. This information is entitled to confidential classification on the basis that it is

information relating to competitive interests, the disclosure of which would impair Southern Bell's competitive business if publicly disclosed. Section 364.183(3), Florida Statutes, specifically provides that such information is proprietary confidential business information. If Southern Bell's competitors had access to this information, they could construct reactive plans to impede or even thwart Southern Bell's competitive initiatives. Southern Bell developed this information for use in strategically planning its business operations, and the subject information is not shared outside of the Company in the form and to the extent contained in these documents. If Southern Bell's competitors had public access to this information, their marketing efforts could easily be focused and specifically designed and targeted to take full advantage of Southern Bell's assessment of competitive alternatives. Any advantage gained through such use of Southern Bell's information would cause a concomitant adverse effect on the Company's business. Moreover, this type of information is not made public by Southern Bell's competitors, nor is it shared at all in competitive arenas. Consequently, Southern Bell's competitive strategies are equally entitled to be protected from public disclosure.

10. The inside wire and CPE business are a competitive businesses, and companies participating in that market do not typically share their capital investment and profit margins with their competitors. Section 364.183(3)(e), Florida Statutes,

specifically includes "information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information" as proprietary confidential business information. Knowledge of discrete elements in a competitor's cost structure, such as current investment costs in the context of the inside wire business, would make it easier to estimate the competitor's overall costs which must be covered through advertising revenues.

Consequently, knowledge of a competitor's costs could help in setting strategic advertising rates in certain markets subject to the greatest competition.

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- 11. In the fourth category, Southern Bell has provided internal audit reports and workpapers. Section 364.183(3)(b) specifically states that internal audit reports are exempt from the Public Record Act. Thus, the portions of the documents which contain such information should be held to be proprietary and confidential.
- 12. In the final category, Southern Bell has provided information relating to Southern Bell's computer security systems. Disclosure of this information would make it possible for unauthorized individuals to gain access to Southern Bell's LMOS computer system which could harm individual customers and the Company. Thus, this information is confidential business information pursuant to Section 364.183(3) and is exempt from the Open Records Act.

13. In accordance with Rule 25-22.006, Florida
Administrative Code, the information for which confidential
treatment is sought is intended to be and is treated by the
Company as private and has not been disclosed on a
nonconfidential basis.

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WHEREFORE, Southern Bell Telephone and Telegraph Company moves the Prehearing Officer to enter an Order declaring the information described above, and contained in the indicated portions of the attached documents, to be confidential, proprietary business information and thus not subject to public disclosure.

Respectfully submitted this 3rd day of March, 1993.

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

1/2 / D //

HARRIS R. ANTHONY
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c/o Marshall M. Criser

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R. DOUGLAS LAC

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#### ATTACHMENT "B"

Two edited copies of the document with the confidential information deleted.

# ATTACHMENT "C"

One copy of the document with the material which is confidential and proprietary highlighted.

# FPSC DOCKET 910163-TL SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY REQUEST FOR CONFIDENTIAL CLASSIFICATION

# FPSC STAFF'S EARLY PRODUCTION REQUESTS IN BOXES LABELED "A" THROUGH "Z"

#### EXPLANATION FOR PROPRIETARY INFORMATION

- A. This information reflects customer specific information. The Commission has always zealously protected customer specific information in order to protect the customer's privacy and prevent a competitor of the customer from obtaining an unfair advantage. As such, this information is classified as confidential business information pursuant to Section 364.183, Florida Statutes, and is exempt from the Open Records Act. Unless otherwise identified, most of this information is found in customer bills or Extended Trouble Histories (ETHs). The fields in which the customer specific information can almost always be found are as follows:
- 1) ETH/DLETH LN, SA, LOC, NAR, after "A B C". See Example attached.
- 2) Bill NAME, ADDRESS, SS#, CI:, NAME OF LONG DISTANCE VENDOR, See example attached.

This information may include: customer name, address, social security number, employer, credit information, access information to home, long distance vendor and other private information that should be protected from public disclosure.

- B. This information reflects employee personnel information unrelated to compensation, duties, qualifications or responsibilities. As such, this information is classified as confidential business information pursuant to Section 364.183, Florida Statutes, and is exempt from the Open Records Act. This information consists of the employee social security number which can be used to the detriment of the employee.
- C. This information relates to Internal Audits conducted by Southern Bell's Internal Auditing Department. Southern Bell considers this information proprietary and confidential business information. As such, this information is specifically classified as confidential business information pursuant to Section 364.183, Florida Statutes, and is exempt from the Open Records Act.

# FPSC DOCKET 910163-TL SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY REQUEST FOR CONFIDENTIAL CLASSIFICATION

FPSC STAFF'S EARLY PRODUCTION REQUESTS
IN BOXES LABELED "A" THROUGH "Z"

#### EXPLANATION FOR PROPRIETARY INFORMATION

- D. This information relates to Southern Bell's computer security systems. Southern Bell considers this information proprietary and confidential and restricts its distribution within the company. This information could make it possible for unauthorized individuals to gain access to Southern Bell's LMOS computer system which could harm individual customers and the company. As such, this information is classified as confidential business information pursuant to Section 364.183, Florida Statutes, and is exempt from the Open Records Act.
- E. This information relates to competitive interests and/or unregulated operations, the disclosure of which would impair the competitive business and/or unregulated operations of Southern Bell. In particular, this information discusses aspects of Southern Bell's CCS, CPE, and/or Inside Wire services. As such, this information is classified as confidential business information pursuant to Section 364.183, Florida Statutes, and is exempt from the Open Records Act.

# LOCATION OF PROPRIETARY INFORMATION

BOX A/FOLDER			
	PAGE	LINE/COLUMN	REASON
Document #1	1	2,3,8	A
Document #2	3 4	2-3,8,12,19,23 2-4,7,10,19,31	A A
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Document #11	2	1,2,7,27,31,35,44	A
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Document #15	2-3	1,2,7	A
Document #16	3 4	3,4 4,5	A A
	8	1,2	A
Document #17	1	6,7,22,23	A
Document #18	2	1,2,7	A
Document #19	2	1,2,7	A
Document #20	2-3	1,2,7	A
Document #21	2	1,2,7	A
Document #22	2	1,2,7	A
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Document	#26	2	1,2,7	A
Document	#27	2	1,2,7	A
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Document	#29	2	1,2,7	A
Document	#30	2	1,2,7,12,25,46	A
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Document	#59	All	Entire Document	С
Document	#70	All	Entire Document	С
Document	#71	All	Entire Document	С
Document	#72	All	Entire Document	С
Document	#73	5	1,2,7	A
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		7	1,2,7	A
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		11	1,2,7	A
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		14-16	1,2,7	A
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		18-21	1,2,7	A
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# ATTACHMENT "A" LOCATION OF PROPRIETARY INFORMATION

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		12	1,2,7,40	A
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		18	1,2,7,22,26,44	A
		19	1,2,3,7,27,31	A
		23	1,2,7,18,24,29	A
		24	1,2,7,24,30,34,41	A
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		55	1,2,7,24,30,34,41	A
		56	1-3,7,18,25,28	A
		59	1,2,3,7,27	A
		60	2,3,8,23,27,36,45	A
		76	2,3,8,24,27,42,43	A
		79	2,3,8,23,26,27,34,41,42	A
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		8	1,2,7,22	A
		15	1,2,7,22,26,44	A
		16	1,2,7,22,27,31	A
		21	1-3,7,28,29	A
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		42	1,2,7,22,26,33,40,41	A
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Document #11	11	1,2,7,10,25,29,41	A
	12	1,2,7,22	A
	18	1,2,7,22,27,36,45	A
	19	1,2,7,22,27	A
	23	1-3,7,18,25,29	A
	24	1,2,24,30,34,41	A
	38	1,2,7,23,42	A
	40	1,2,6,21,24,25,32,39	9,40 A
BOX C/FOLDER 5			
	PAGE	LINE/COLUMN	REASON
Document #3	6	1,2,7,28,40	A
	7	1,2,7,35	A
	10	1,2,32	A
	12	1,2,7,40	A
Document #4	7	1,2,7,26	A
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	18	1,2,7,26	A
BOX C/FOLDER 6			
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Document #9	11	1,2,10,25,29,41	A
	12	1,2,7,22	A
	18	1,2,7,22,27,45	A
	19	1-3,22,27,31	A
	23	1-3,7,18,25,29	A
	24	1,2,7,24,31,34,41	A
	38	1,2,8,12,24,27,43	A
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Document #22	7	1,2,7,26	A
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	17,18	2,7,26	A
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BOX D/FOLDER 2	PAGE	LINE/COLUMN	REASON	
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BOX E/FOLDER 2	PAGE	LINE/COLUMN	REASON	
Document #9	218 219 225 226 230 231 245 247	2,3,8,11,26,30, 2,3,8,23 2,3,8,23,28,37, 2,3,4,8,22,28,3 2,3,8,19,26 2,3,8,25,31,35, 2,3,8,24,27,43 2,3,8,23,26,41,	46 2 42	A A A A A
Document #30	333 334 341 342 347 348 366 368	2,3,8,11,26,30, 2,3,8,23 2,3,8,23,28,37, 2,3,4,8,22,28,3 2,3,8,19,26 2,3,8,25,31,35, 2,3,8,24,27,43 2,3,8,23,26,41,	46 2 42	A A A A A

BOX F/FOLDER 1		PAGE LINE/COLUMN	REASON
Document #1	A	11 Entire Document	D
BOX F/FOLDER 2	PAGE	LINE/COLUMN	REASON
Document #1	All	Entire Document	C
Document #3	All	Entire Document	С
Document #4	A11	Entire Document	С
BOX F/FOLDER 3			
	PAGE	LINE/COLUMN	REASON
Document #1	A11	DLETH	A
Document #2	All	DLETH	A
BOX F/FOLDER 4	PAGE	LINE/COLUMN	REASON
Document #1	2 3 4 5 6 7 8 9 10 11 12 13 15 16 17 18 19 20 21 22 23	12,13,28,29 5,6,17,18 11,12,28,29 8 11,12,29,30,36,37 9,10,23,24,30,32 4,5,7,11,12 4,11-13,28,29,34 10-12,27,28,34,36 5,6,21,22,27 4 3 4,11-13,26-28,34,36 6,7,12,21,22,28,30,3 8,10,17-18,34-36 4,6,13-15,21,23 3 3 9,10,15,26,27,33,35 4,10,11,17,20,27,28,	A A B B B

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#### BOX F/FOLDER 4

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PAGE
         LINE/COLUMN
                              REASON
 24
       5,6,22,23,28
                              A
 25
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 26
       3
                              В
 27
       12, 13, 20, 22, 29, 30, 36
                                 A
 28
       8,9,24,25,34
                              A
 29
       5,6,17,18,27
                              A
 30
                              В
 31
       9,10,24,25
                              A
 32
       15, 16, 23, 25, 31, 32
                              Α
 33
       11,12,17,18
                              A
34
                              В
 36
       6,7,23,24,39
                              A
       3,16,17,26,33,34
 37
                              Α
 38
       14,15,31,32,38
                              A
 40
                              В
 41
       7,8,23,24,30,32
                              A
 42
       9,10,28,29,33
                              A
 43
       4,5,11,13
                              A
44
                              В
       3
 45
       8,10,24,25
                              A
46
       15,16,23,25,29,31,35
 47
       5,6,20-22,37,38
                              A
48
       7,9,16,17,24,26
                              A
49
       3
                              В
50
       3
                             В
51
       11,12,19,21,28,29,35,36
52
       10-12,26,27,33
                             Α
53
       6-8,13,15
                             A
54
                             В
55
       6,7,20,22,37,38
                             A
56
       11,12,27-29,33,34,35
                                  A
57
       13,14,30,31,36
                             A
58
       7,9,16,17,23
                             Α
59
       12, 13, 29, 30, 36
                             A
60
       11,12,27-29,33
                             Α
61
       4,5,20,22,35,36
                             A
62
       17,18,23
                             A
63
       3
                             В
64
       3
                             В
65
       9-11,15,16
                             Α
66
       6,7,9,14,16,24-26,31,33
       39,40
67
       7,8,13-15,21,23
                             Α
68
                             В
70
       3,4,17,18,34,35
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PAGE	LINE/COLUMN	REASON
71	13,14,29,30	A
72	5,6,	A
73	3	В
74	7	В
75	2,3,	Ā
76	2,3,	Ā
78	7,8,14,16	A
79	4,5,7,16,18,23,33,3	
80	7,14,15,22	A
81	3	В
83	5,6,20,22,37-39	Ā
84	15,16,32-34	A
86	3	В
87	3	В
89	3	В
90	12-14,29,30,36	A
91		A
92	10,11,26,27,32	A
93	6,7,13 3	
		В
94	8,9,15,17	A
95 06	4-6,20,22,36-38	A
96	13,14	A
97	3	В
98	11-13,27,28,34,36	A
99	9,10,26,27,33,35	A
100	5,6,20,22,36,37	A
102	3	В
103	8-11,13	A
104	3	В
106	6,7,20,22,37-39	A
107	15,16,32,33	A
109	3	В
110	11,12,24,25,31	A
111	10-12,27,28,34,36	A
112	5,6,22,23,29,31	A
113	3	В
115	3,4,19,20,36,37	A
116	5,15-17,32-34	A
117	11,12,27,28,33,34	A
120	2,3,	A
121	2,3,27,28	A
1.22	2,3,27	A
1.25	5,6,21-23,37,38	A
126	17,18,25,27	A
127	3	В
128	9-11,26,27,33,35	Ā
129	6,7,22,23,28,30	A
130	4-6,20,22,28	A
l31	3	В
L <b>3</b> 2	7,9,10,24-26	Ā
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#### BOX F/FOLDER 4

PAGE	LINE/COLUMN	REASON
133	16,17,33,34	A
134	12,13,18,19	A
135	<b>3</b>	В
136	11,12,28,29,35	A
137	10,11,27-30,33-35	A
138	6,7,13,15	A
139	3	В
140	7,8,	A
141	14-16,31,32,37,38	A
142	10-12,24-26,36,37	A
143	15-17,31,32,34,38	A
145	3	В
146	3	В
147	8,9,15	A
148	9,10,26-28,33,35	A
150-1		В
190	2,3,28,29	A
191	6	В
198	2,3	A
199	2,3,27	A
200	2,3,37	Ā
201	5	В

BOX F/FOL	DER 5	PAGE	LINE/COLUMN	REASON
Document	#2-#9	ALL	DLETHS (approx.	500 pp) A
BOX F/FOL	DER 6	PAGE	COLUMN/LINE	REASON
Document	#1	2 4 12 14 15 16 24 25 66 67 68 83 84 85 86 87 88 96 97 98 100 103 104 105 107 108 109 110 111 112 128 129 130 131 149 159 169	C D C B B B D D 9-15,26-34 A A A F F F F F B B B B B C C C C C C C C C C	888888888888888888888888888888888888888

#### BOX F/FOLDER 4

PAGE	LINE/COLUMN	REASON
170-17	8 D	В
180-20	4 D	В
206-211	D	В
213-229	D	В
231	D	В
233	D	B
236	Ď	B
238-246	D	B
249-267	Ď	В
365-367	В	B
370-377	Ċ	В
379	Č	В
380	Ē	В
395	č	В
406	9-15,26-34	В
407	9-17	В
408	6,9-17,22,25-34	_
409	6,10-18,24,27-35	В
426-431	F	В
462	D D	В
402	D,	В
488-489	D	В
527-548		В
550-618		В
330 010		D

BOX F/FOLDER 7

ALL

CUSTOMER BILLS (approx 30 pp) A,E

#### BOX F-1/FOLDER 8

Document #1

PAGE ALL LINE/COLUMN CUSTOMER BILLS REASON A, E

#### LOCATION OF PROPRIETARY INFORMATION

BOX G/FOLDER	1 PAGE	LINE/COLUMN	REASON
Document #1	2	1,2,6	A
	3	1,2,5,26	A
	4	2,3,8	A
Document #5	3	2,3,8,19	A
	4	2,3,8	A
Document #6	2	Column C	В
	3	Column C	В
	4	Column C	В
	5	Column C	В
	6	Column C	В
	7	Column C	В
	10	2,3,8	A
Document #7	3	2,3,8,12,23	A
	4	2-4,8,21	A
	5	2,3,8,31,34	A
Document #10	9	6,7	A
	10	6,7	A
	14	2,3	A
	16	6,7,21,22	A
Document #11	2	2,3,6	A
Document #12	2	2,3	A
Document #14	2	2,3,7	A
	3	2,3,8	A
Document #15	2	2,3,6,26,30,34	A
Document #16	2	2,3,7	A
Document #17	2	2,3,6	A
Document #18	2,3	2,3,7	A
Document #19	2	2,3,7	A
Document #20	2	2,3,7	A
Document #21	2	2,3,7	A
Document #22	2	2,3,7	A

BOX F/FO	LDER 4	PAGE	LINE/COLUMN	REASON
Document	#23	2	2,3,7	A
Document	#24	2	2,3,7	A
Document	#25	2	2,3,7	A
Document	#26	2	2,3,7	A
Document		2	2,3,7,12	A
Document		2	2,3,4,7,25	A .
Document	#29	2	2,3,7	A
Document	#30	2,3	2,3,7	A
Document	#32	2	2,3,4,9,32	A
Document	#33	2	2,3,8	A
Document	#34	4 5	2,3,7,20,24,34 2,3,7,22,33,48	A A
		6	2,3,7,22,26,30,38	A
		7	2,3,8,21,27,32,43	A
		8	2,8,13,22,29	A
		10	2,3,8,23,36	A
			2,3,7,33	A
			2,3,7,23	A
			2,3,8,28	A
			2,3,4,8,13,17,34	A
		16	2,3,8,32 2,3,8	A A
Document	#35	2-4	2,3,8	A
Document	#37	2	2,3,8	A
		3	2,3,4	A
		4	2,3,8,24	A
		5	2,3,8	A
		6	2,3,4,8,24	A
		7	2,3,8	A
		8	2,7	A
		9 10	2,3	A
		11	2,3,4,8 2,3,4,8	A A
		12	2,3,8	A A
		13	2,3,8	A
		14	2,7,11	A
		15	2,3,8	A

BOX F/FOLDER 4			
Document #39	<b>PAGE</b> 2-7	LINE/COLUMN COLUMN C	REASON B
Document #42	2	2,3	A
Document #43A	5	2,3,4,8	A
	6 7	2,3,8 2,3,8	A A
	8	2,3,8,31	A A
	9	22	A
	10	2,3,8	Ā
	11	2,3,8,12	A
	12	2,8,10,12,33	A
	13	2,3,8	A
	14	2,3,8	A
	15	2,3,8	A
	16	2,3,8	A
	17	2,3,7,22	A
	18	2,3,8	A
	19	2,3,8	A
	20 21	2,3,8	A
	21	2,3,8	A
Document #45	2	2,3,8	A
	3	2,3,4,8	A
	4	2,3,8	A
	5	2,3,8	A
Document #49	2	2,3,8,38	A
	3	2,3,8	A
	4	2,3,8,27	A
	5	2,3,8,36	A
BOX G/FOLDER 2,3 &	4 PAGE	LINE/COLUMN	DEACON
	7 11011	HTHE/ COPOUN	REASON
Document #1 in each folder	All	Customer Bills (approx 3750 pp)	A,E
		( FE STORY	

BOX H/FOLDER	5 PAGE	LINE/COLUMN	REASON
Document #1	ALL	CUSTOMER BILLS (approx 1250 pp)	A
BOX H/FOLDER	6 PAGE	LINE/COLUHN	REASON
Document #1	ALL	CUSTOMER BILLS (approx 1250 pp)	A
BOX K/FOLDER	1 PAGE	LINE/COLUMN	REASON
Document #16	A11	Entire Document	С
Document #17	All	Entire Document	С
Document #39	All	Entire Document	С
Document #74	2	1,2,7	A
	3	1-3,10	A
	4	1,2,7	A
	5	1,2,7,10,11	A
	6	1,2,7,23	A
	7	1,2,7	A
	8	1,7,11	A
	9	1,2,10,12	Ą
	10	1-3,7,10,11	A
	11	1-3,7,11	A
	12	1,2,7,11	A
	13	1,2,7	A
	14	1,7,11	A
	15	1,2,7	A
Document #106		1,2,7	A
	3	1,2,7,12,21	A
	4	1,2,7	A

BOX F/FO	LDER 4			
_			LINE/COLUMN	REASON
Document	#107	4	1,2,7,20,24,34	A
		5 6	1,2,7,31,46 1,2,7,11,22,26,30,37	A 7 A
		7	1,2,7,11,22,26,30,3	A
		8	1,2,7,12,21	A
		9	1	A
		10	1,2,7,22,35	A
		11	1,2,7,33	A
		12	1,2,7,23	A
		13	1,2,7,27	A
		15	1-3,12,16,33,38	A
		16 17	1,2,7,31 1,2,7	A
		17	1,2,7	A
Document	#109	2	1,2,7	A
Document	#110	2	2,3,7,11,30	A
Document	#111	2	2,3,7	A
Document	#112	2	2,3,8	A
Document	#113	2	2,3,8	A
Document	#114	2	2,3,8	A
Document	#115	2	2,3,4,8,12,25,26	A
Document	#116	2	2,3,8	A
Document	#118	2	2,3,8	A
Document	#120	2	2,3,8	A
Document	#121	2	2,3,8	A
Document	#122	2	2,3,8	A
Document	#123	2	2,3,8	A
Document	#124	2	2,3,8,12	A
Document	#125	2	2,3,8	A
Document	#126	2 3	A ' -	A A

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BOX F/FOLDER 4			
Document #127	PAGE 2	LINE/COLUMN 2,3,8	REASON A
Document #128	2	2,3,8	A
Document #129	2	2,3,8,28,32,36,45	A
Document #130	2 2	2,3,8 2,3,8	A A
Document #132	2 3	2,3,8 2,3,8	A A
Document #133	2 3 7 8	2,3,8 7,8,22,23 6,7 6,7	A A A

BOX N/FOLDE	R 1	PAGE	LINE/COLUMN	REASON
Document #1	4	17 18 19 20 21 23 24 25 26 27 28 29 30	2,3,8 2,3,9,12 2,3,8,12,26 3,4,9 5-12/COL A 2-7 2-4,6,7 2-4,6,7 2-7 2-4,6,7 2-4,6 2-6 2-4,6,7	A A A A A A A A A
BOX O/FOLDE	R 1	PAGE	LINE/COLUMN	REASON
Document #	1	All	DLETHS (approx. 100	pp.) A
Document #	7	1-221	DLETHS	A
BOX P		PAGE	LINE/COLUMN	REASON
Document #	1	All	ETHS (approx. 5,000	pp.) A
BOX R/FOLDE	R 1	PAGE	LINE/COLUMN	REASON
Document #3	3	1.	9	В
Document #	4	1-20	Customer Bills	A,E
Document #	5	1-254	Customer Bills	A,E.
Document #6	5	1-35	DLETHS	A
Document #7	7	1-4	Customer Bills	A,E
Document #9	)	1-22	Column C	В
Document #12		1-15	DLETHS	A

BOX R/FO	LDER 2	PAGE	LINE/COLUMN	REASON	
Document	#3	1-8	Customer Bills	A,E	
BOX S/FO	LDER 2	PAGE	LINE/COLUMN	REASON	
Document	#3	3-68	2 pages telephone nu followed by 66 pages		
Document	#4	3-66	2 pages telephone no followed by 64 pages		
Document	#6	3-58	2 pages telephone nu followed by 56 pages		
Document	<b>#</b> 7	3-56	2 pages telephone nu followed by 54 pages		
Document	<i>#</i> 8	3-55	2 pages telephone nu followed by 52 pages		
Document	<b>#</b> 9	3-56	2 pages telephone nu followed by 54 pages		
Document	#10	3-55	2 pages telephone nu followed by 53 pages		
Document	#11	3-59	2 pages telephone nu followed by 57 pages		
Document	#12	3-58	2 pages telephone nu followed by 56 pages		
Document	#13	3-60	2 pages telephone nu followed by 58 pages		
BOX S/FOI	DER 3				
Document	#1	3-65	2 pages telephone nu followed by 63 pages		
Document	#2	3-58	2 pages telephone nu followed by 56 pages		
Document	#3	3-57	2 pages telephone nu followed by 55 pages		
Document	#4	3-56	2 pages telephone nu followed by 54 pages	mbers A DLETHS	

BOX S/FOLDER 3			
	PAGE	LINE/COLUMN	REASON
Document #5	3-62	2 pages telephone n followed by 60 page	
Document #6	3-56	2 pages telephone n follwed by 54 pages	
Document #7	3-53	2 pages telephone n followed by 51 page	umbers A s DLETHS
Document #8	2-37	1st page telephone followed by 36 page	
Document #9	All	DLETHS (13 pages)	A
Document #10	All	Entire document	E
BOX T/FOLDER 2	PAGE	LINE/COLUMN	REASON
Document #6	ALL	DLETH	A
BOX T/FOLDER 3	PAGE	LINE/COLUMN	REASON
Document #7	A11	Entire document	E
BOX T/FOLDER 4			
JOA 17 TOHOMA 4	PAGE	LINE/COLUMN	REASON
Document #8	All	Entire document	E
BOX T/FOLDER 5			
<b>_</b>	PAGE	LINE/COLUMN	REASON
Document #9	All	Entire document	E

#### LOCATION OF PROPRIETARY INFORMATION

BOX U/FOL	DER 2				
		PAGE	LINE/CO1	LUMN	REASON
Document	#6	All	Employee	Statements	В
BOX U/FOL	DER 3	PAGE	LINE/COI	LUMN	REASON
Document	#10	All	7 pages,	pp. 5 & 6 l	DLETH A
BOX U/FOL	DER 4	PAGE	LINE/COI	LUMN	REASON
Document a	#14	All	Entire Do	cument	E∗
Document :	#17	All	Entire Do	cument	C
*PREVIOUS	LY FILED	RCCSEI	BOX W		
BOX V/FOL	DER 1	PAGE	LINE/COI	LUMN	REASON
Document	#1	ALL	COLUMN C		В
BOX V/FOLI	DER 3				
7,502		PAGE	rine\coi	.UMN	REASON
Document	#3	A11	Entire Do	cument	С
Document	<b>#</b> 6	All	Entire Do	cument	D*
Document	<i>#</i> 7	All	DLETHS		A
BOX V/FOLI	DER 4	PAGE	LINE/COL	JUMN	REASON
Document	#8	All	DLETHS		A

<sup>\*</sup>PREVIOUSLY FILED RCC--SEE BOX W

Documents in boxes  ${\tt X}$  and  ${\tt Y}$  are documents which are already protected under a previous request.

```
DLETH EC 075 TN 904 325 0000
                                    LODATE 00-00-00 HIDATE 12-31-99 PRTR V195
     XXXX, XXXX X. (NAME)
 LN
 SA
     000 Your Drive (Address)
 LUC APT O
 ---HIST---
 NŪ
      REPORT
                   S
                        CLEARED
                                                 TST RPM SWK RSL T
                                         CLOSED
 1 08-07-89 "943A 0 08-07-89 1230P 08-07-89
                                                            0 0 100
                                             1347
                                                     0 356
   LN - XXXX, XXXX X. CAT 1
01 DTR=08-07-89 943A COM=08-07-89 600P RSA=114
   CALLED-NO= - -
                          CATEGORY=1 VER=71 CVER=
            $CCG CBC-ALPHS-EQPT CK OK
NAR CC NDT
NAR A
            B
                 MS WK #
                                                     328
02 DNT=08-07-89
                 943A EC=114
                               ST=PSM
                                       R1E=00000000
                                                    MP=NWP
                                                            RSL = 1
03 DNT=08-07-89 943A
                       EC=299
                               ST=PSH
                                       RTE=00000299
                                                    MP = NWP
                                                            RSL = 1
NAR 107AV71N
04 DNT=08-07-89 1052A EC=064
                               ST=PDO
                                       RTE=00000300
                                                    MP=SCR
                                                            RSL = 100
NAR R1/0900/TOK LIKE ROH-EQUIP OK PER SUB
05 DNT=08-07-89 1057A EC=083
                               ST=DPO
                                       RTE=09907356
                                                    WP=DO
                                                            RSL =
06 DNT=08-07-89 1230P EC=356 ST=CCA
                                      RTE=00000027
                                                    WP=CR0
                                                            RSL =
07 DNT=08-07-89 1230P EC=027 ST=CLO RTE=00000027
                                                    HWH= 9W
                                                            RSL =
NAR REPLD CH UNIT
                             /CTTNDD353
 2 08-03-89 1026A 1 08-04-89 445P 08-04-89 454P
                                                    0 347
                                                            Ó
                                                                0 100 900 600
   LN - XXXX, XXXX X. (VAME) CAT 1
01 DTR=08-03-89 1026A COM=08-05-89 500P RSA=165
   CALLED-NO= - -
                         CATEGORY=1 VER=71 CVER=
NAR CC NDT #NDT.CCO.CBC.A/PH/EQPT OK
                    (NAME) ACCESS INFORMATION EST.
           В
                                                     328
02 DNT=08-03-89 1026A EC=165 ST=PSM RTE=00000000
                                                    MP-NMP
                                                            RSL= 1
03 DNT=08-03-89 1026A EC=299 ST=PSH
                                      RTE=00000299
                                                    MP=NWP
                                                            RSL = 1
NAR 107AV71N
04 DNT=08-03-89 1252P EC=014 ST=PD0
                                      R7E=00000300
                                                    WP=SCR
                                                            RSL = 110
NAR HARD SHT/GRD
05 DTR=08-03-89 1253P COM=08-03-89 600P RSA=014
   CALLED-NO= - -
                         CATEGORY=1 VER=LU CVER=
NAR CC NOT CHG COMMM EQUIP OK
                   (NAME)
                                                     328
06 DN1=08-03-89 1253P EC=034 ST=PD0 RTE=0000030Z
                                                    MP=NMP
                                                            RSL =
NAR PSC222/SHT034 SMJ/CUS DA. RCH# DA/08-03-89 0511P
07 DN)=08-04-89 213P EC=341 ST=PD0 RTE=00000302
                                                    WP=NWP
                                                            RSL =
NAR VER O: AUTO REJECT AT DISPATCH
08 DNY=08-04-89
                214P EC=341
                              ST=HLD
                                      RYE=00000341
                                                    되는 = 원칙단
                                                            RSL =
NAR VER O: AUTO REJECT AT DISPATCH
                                                                     SHP DW
09 DNY=08-04-89
                3567 EC=061
                              ST=PD0
                                      R7E=00000300
                                                    MERMAN
                                                            RSL=
NAR (OVR)NDT
10 DNT=08-04-89
                357P
                      EC=081
                              ST=DPO
                                      RTE=09907347
                                                            RSL=
                                                    0C=9M
11 DNT=08-04-89
                445F
                      EC=347
                              SY=CCA
                                      RTE=00000061
                                                    WEFCRO
                                                            RSL=
12 DNY=08-04-89
                4458
                      EC=061
                              ST=CLO
                                      RTE=000000061
                                                    MP=NMP
                                                            R3L ≈
VAR FOR NOTIFIED CUST/OK PER (NAME)
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9 500

3 03-07-88 1124A | 0 03-07-88 1145A 03-07-88 1154A | 0 | 22

\*\* CONTINUED ON NEXT PAGE \*\*\*

305-557- \* \* \* 817 BILL DATE 10-26-90 LIVE EXCH MMIP 10 RTA 00000000 TAX 11111N1 FE 00001 AG C BTN
TAR 203800 SSN XXX-XX-XXXX TTN 305557XXXX
CSN STA 00000000 DEP 00000000
DISC REAS OLD/NEW # 305828984 XXXX ANT DUE 104.80
DOI 890525 PIC NAME ANDRESS RB PPD HLH FL 33016 NOB Personal Information 00026 00307 00060 000000000100 RCK 000000 WO IND O FNL BILL AMT 0.00 TOT PHTS 132.09CR TCT ADJ 0.00 0 PYMT DATE 000000 PYMT POST DATE 000000 LAST BILL 132.99
PAYMENT INFO: BATCH # AST DILL 0.00 BAL DUE PAYMENTS AND ADJUSTMENTS: DATE T BATCH ENTITY AMOUN 1019 A Y37 A10 132.9

SOUTHERN BELL

ACCOUNT NUMBER: 305-557-XXXX 817 0440 OCT 26, 1990 PAGE 1

CURRENT CHARGES BALANCE PAYMENTS ADJUSTMENTS CHARGES AMOUNT DUE BEFORE NOV 20 \$132.99 \$132.99 \$0.00 \$104.80 \$104.80

\*\*\*\* PLEASE NOTE: A 1.5% LATE PAYMENT CHARGE WILL APPLY
TO ANY UNPAID BALANCE AS OF NOV 27.

MONTHLY SERVICE CHARGES

1. MONTHLY SERVICE—OCT 26 THRU NOV 25
(ITEMIZATION OF LOCAL BILLING AVAILABLE UPON REQUEST.)
2. FCC CHARGE FOR INTERSTATE TOLL ACCESS
3. MAINTENANCE PLAN(S)

DETAILED STATEMENT OF CHARGES
AMOUNT TOTAL LM-TICKETID—BSRRMMT
11.65
11.65
2.50

\*\*\*\* PLEASE NOTE: HELPFUL NUMBERS ARE LOCATED FOLLOWING YOUR SOUTHERN BELL CURRENT CHARGES.

\*\*\*\*\*\* PLEASE FOLD, TEAR HERE AND RETURN THIS PORTION WITH YOUR PAYMENT \*\*\*\*\*\*

CURRENTCHARGES
CHARGES
PAST DUE
NEW
AMOUNT
OCT 26, 1770

1126 R10

PLEASE MAKE CHECK PAYABLE TO SOUTHERN BELL IN U.S. FUNDS.

L CACHEDO A		
SOUTHERN BELL ACCOUNT NUMBER: BILL DATE:	305-557- XKA OCT 26, 1990 PAGE 2	XX817 0440 D
MONTHLY SERVICE CHARGES (CONTINUED)  4. EMERGENCY 911 MONTHLY CHARGE. THIS TARIFFED CHARGE	TOMA	TOTAL LM-TICKETID-BSRRMM
IS BILLED ON BEHALF OF DADE CO COUNTY  5. EMERGENCY 911 INSTALLATION CHARGE. THIS CHARGE HAS	.19	
6. DIRECTORY ASSISTANCE (DA) USAGE	.14	•
5. EMERGENCY 911 INSTALLATION CHARGE. THIS CHARGE HAS BEEN PLACED ON YOUR BILL BY DADE CO COUNTY  6. DIRECTORY ASSISTANCE (DA) USAGE  3 CALL(S) TO LOCAL DA AT NO CHARGE  1 CALL(S) TO LOCAL DA AT \$.25 EACH  OTHER CHARGES AND CREDITS	.25	18.23
OCT 26 90 SO MANHOLE 7. COST OF DADE COUNTY MANHOLE ORDINANCE #83-3 DIRECT DIALED CALLS SUBTOTAL	`- <b>₀</b> 01	.01
8. OCT 12 FTLAUDERDL FL 305 581 KD 208PM 1 10. OCT 26 HOLLYHOOD FL 305 923 KE 1041PM 1 10. OCT 26 HOLLYHOOD FL 305 923 KE 1041PM 1  TOTAL FOR 705 567 MINUTES	1:30 1:16 :13	1 JK 028801021 1 JK 008801021 1 JK 468801021
(FEDERAL TAX .05)		1437
TOTAL CHARGE FOR ITEMIZED CALLS 1.59 FRANCHISE/TAXES 11. FRANCHISE CHARGES 12. FEDERAL TAX 13. CITY TAX 14. FLORIDA GROSS RECEIPTS SURCHARGE SOUTHERN BELL CURRENT CHARGES	.12 .52 1.18 .14	1.96 21.79
e *		!

\*RATE APPLIED - SEE BACK OF PAGE

TXC	ACCOUNT NUMBER: BILL DATE:	305-557- XXX OCT 26, 1990 PAGE 4	817 0440
DIRECT DIALED CALLS FOR 305-557- KKKK	10175 7510	AHOUNT	TOTAL LM-TICKETID-BSRRMMT
DATE PLACE CALLED NUMBER CALLED 1. SEP 29 BRONX NY 212 584- 2. OCT 4 SANTODMINGO DR 800 505- 3. OCT 4 SANTODMINGO DR 800 505- 4. OCT 5 NEW YORK NY 212 740- 5. OCT 6 SAN JUAN PR 800 772- 6. OCT 13 SANTODMINGO DR 809 505- 7. OCT 13 SANTODMINGO DR 809 507- 8. OCT 20 BRONX NY 212 584- 9. OCT 20 SANTODMINGO DR 809 505- 10. OCT 22 SANTODMINGO DR 809 505- 11. OCT 22 SANTODMINGO DR 809 507- 11. OCT 22 SANTODMINGO DR 809 507- 11. OCT 24 SANTURCE PR 809 268- 12. OCT 26 SAN JUAN PR 809 724- 13. OCT 26 BRONX NY 212 584- TOTAL FOR 305 557-XXXX (FEDERAL TAX 1.84)	ARATE TIME MIN AN 552PM 2 AT 706PM 25 AE 940PM 16 AN 304PM 1 AT 736AM 11 AT 736AM 11 AT 831AM 11 AN 1144AM 2 AR 418PM 3 AR 418PM 3 AR 903AM 1 AO 359PM 3 AE 508PM 1 SUBTOTAL	26.39 26.39 26.39 27.39 27.30	JK 368J01021 G JK 088L01021 JK 538L01021 JK 538L01021 JK 288901021 JK 098L01021 JK 418L01021 JK 388J01021 JK 388J01021 JK 328L01021 JK 038L01021 JK 038L01021 JK 518J01021
TOTAL CHARGE FOR ITEMIZED CALLS 60.0 TAXES 15. FEDERAL TAX 15. FLORIDA GROSS RECEIPTS SURCHARGE CURRENT CHARGES  TX C	O7 SUBTOTAL	1.84 1.20	3.04 63.11

JIXC

THIS PORTION OF YOUR BILL IS PROVIDED AS A SERVICE TO THERE IS NO CONNECTION BETWEEN SOUTHERN BELL AND YOU MAY CHOOSE ANOTHER COMPANY FOR YOUR LONG DISTANCE TELEPHONE \*RATE APPLIED - SEE BACK OF PAGE

\*\*\* J 21 \*\*\*

TXC	ACCOUNT NUMBER: BILL DATE:	305-557- XXXX OCT 26, 1990 PAGE 5	817 0440
BILLED ON BEHALF OF	· ·	AHOUNT	TOTAL LM-TICKETID-BSRRM
OPERATOR ASSISTED CALLS FOR 305-557-XXXX DATE PLACE CALLED NUMBER CALLED 1. SEP 23 FR PENSACOLA FL 904 457- 2. SEP 28 FR PENSACOLA FL 904 457- 3. OCT 8 FR PENSACOLA FL 904 433-	*RATE TIME MIN KES 718PM 21 KES 559PM 13 KOS 1227PM 17 KOS 439PM 14 SUBTOTAL	5.15 3.59 5.49 4.71	2Ha00852 £8011 2Ha00852 £8011 2Ha00852 £8011 2Ha00852 £8011 18.94
TOTAL CHARGE FOR ITEMIZED CALLS 18.90 5. FEDERAL TAX 6. FLORIDA GROSS RECEIPTS SURCHARGE CURRENT CHARGES  IX.C.	SUBTOTAL	.58 .38	19:90

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