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March 9, 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. 920260-TL, 900960-TL, 910163-TL, 910727-TL

Dear Mr. Tribble:

Enclosed is an original and fifteen copies of a Southern Bell Telephone and Telegraph Company's Notice of Intent to Request Specified Confidential Classification. Please file this document 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,

Nancy B. White
Nancy B. White

- ACK
- AFA
- APP
- CAF
- CMU Enclosures
- CTR
- EAG cc: All Parties of Record
- LEG A. M. Lombardo
- LIN H. R. Anthony
- OPC R. D. Lackey
- RCH
- SEC
- WAS
- QTH Kay
lead DRT

RECEIVED & FILED

EPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
02649 MAR-93
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 9th day of March, 1993 to:

Robin Norton
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101 East Gaines Street
Tallahassee, FL 32399-0866

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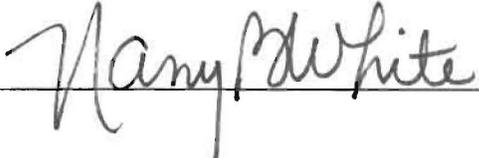
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Stan Greer
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Audit Request No. 2-0027, dated March 2, 1993 - copies of certain selected Coopers and Lybrand workpapers.

Audit Request No. 2-0034, dated March 2, 1993 - copies of the three invoices from BellSouth Corporation used as examples at the meeting with Gary Grace on February 24, 1993.

Audit Request No. 2-0039, dated March 2, 1993 - copy of the manual which describes by account number, the function codes that are in each cost pool.

Audit Request No. 4-0017, dated March 1, 1993 - copies of all reports issued by the billing and collection product team for the years 1990, 1991, and 1992.

Audit Request No. 4-0023, dated March 2, 1993 - copy of the financial system documentation for the MP2700 income statement report.

2.

Some of the information to be reviewed by the Staff is clearly proprietary. Included is information relating to every facet of Southern Bell's business, including its competitive interests. Any competitor or potential competitor of Southern Bell's non-regulated services would desire this information to allow the targeting of lucrative markets. If this were to occur, Southern Bell's revenues could well be diminished which would work to the ultimate detriment of Southern Bell's ratepayers.

3.

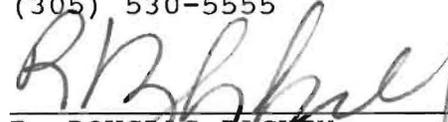
Because this information contains proprietary information, Southern Bell is filing this Notice of Intent to Request Specified Confidential Classification, pursuant to Rule 25-

22.006(3)(a)(b)(5), Florida Administrative Code, in order to allow the Staff to review this information without delay. The original of this notice has been filed with the Division of Records and Reporting, and a copy has been served on the Division requesting the information. The written Staff Request is attached hereto.

Respectfully submitted this 9th day of March, 1993.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY


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March 2, 1993

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AREA #	REQUEST #	DATE REQUESTED	ONE DATE	DESCRIPTION	DATE PROVIDED	FLA. PROP.	POSSESSION OF	ESP	CONF																																										
	2	17.0	3/2/93	3/9/93	PROVIDE COPIES OF EXECUTIVE DIRECTIVE EVENT PROCEDURES. (NY)																																														
		18.0	3/2/93	3/9/93	PROVIDE PRELIMINARY COPIES OF NEW ARMS PROCEDURES, PRIOR ARMS PROCEDURES, AND EXECUTIVE INSTRUCTION #15. (NY)																																														
		19.0	3/2/93	3/9/93	PROVIDE INTERNAL PROCEDURES FOR IBITS BOTH OLD AND REVISED. (NY)																																														
		20.0	3/2/93	3/9/93	FOR THE GROUP THAT HANDLES IBITS DATA BASE REQUEST FOR CLASSIFICATION, TERESA COPELAND'S GROUP, PROVIDE WRITTEN PROCEDURES OR WHERE WRITTEN PROCEDURES ARE NOT AVAILABLE, AN EXPLANATION OF HOW THE GROUP DETERMINES THE CLASSIFICATION FOR AFFILIATED COMPANIES SUCH AS BELLSOUTH CORPORATION, BELLSOUTH INFORMATION SYSTEMS, AND BELLSOUTH COMMUNICATIONS, INC. (NY)																																														
		21.0	3/2/93	3/9/93	WHICH AFFILIATES AND NON-AFFILIATES DOES BSI BILL USING MARKET BASED BILLING (NY)																																														
		22.0	3/2/93	3/9/93	PROVIDE THE MOST RECENT ORGANIZATIONAL CHART OF THE ACCOUNTING AREA FOR BSI AND PENCIL TO BSI UPDATES. (NY)																																														
		23.0	3/2/93	3/9/93	COPIES OF ALL INTERNAL CONTRACTS BETWEEN AFFILIATE COMPANIES. (NY)																																														
		24.0	3/2/93	3/9/93	SYSTEM BILLING TO AFFILIATES AND NON-AFFILIATES FOR 1992. (NY) (NY) (NY)																																														
		25.0	3/2/93	3/9/93	WHICH AFFILIATED COMPANIES ARE NOT FOLLOWING THE CDS AS WRITTEN, LIST AND EXPLAIN HOW THEY ARE BILLING AND WHY THEY ARE DEVIATING AND WHO AUTHORIZED THE DEVIATION. (NY)																																														
		26.0	3/2/93	3/9/93	COOPERS AND LYBRAND MEMORANDUMS, BINDER 34, PAGE 96, 31 CONTAINED A COMPANY-PREPARED SCHEDULE COMPARING AN ESTIMATED JCD ALLOCATION TO ACTUAL BSI BILLING. HOW DID YOU DETERMINE THE DOLLARS IN THE "TOTAL JCD ALLOCATION" COLUMN? PROVIDE EXPLANATIONS AND DOCUMENTATION. (NY)																																														
		27.0	3/2/93	3/9/93	PROVIDE COPIES OF THE FOLLOWING COOPERS AND LYBRAND MEMORANDUMS: <table border="1"> <thead> <tr> <th>BINDER</th> <th>PAGE</th> <th>BINDER</th> <th>PAGE</th> <th>BINDER</th> <th>PAGE</th> </tr> </thead> <tbody> <tr> <td>34</td> <td>95.0</td> <td>34</td> <td>95.04</td> <td>34</td> <td>96.15</td> </tr> <tr> <td>34</td> <td>96.17</td> <td>34</td> <td>96.38</td> <td>34</td> <td>96.52</td> </tr> <tr> <td>48</td> <td>70.1</td> <td>34</td> <td>70.2</td> <td>48</td> <td>70.3</td> </tr> <tr> <td>48</td> <td>70.44</td> <td>45</td> <td>73.108</td> <td>46</td> <td>203.0</td> </tr> <tr> <td>46</td> <td>203.2</td> <td>46</td> <td>203.3</td> <td>46</td> <td>203.4</td> </tr> <tr> <td>46</td> <td>203.5</td> <td>46</td> <td>203.6</td> <td></td> <td></td> </tr> </tbody> </table> (NY)	BINDER	PAGE	BINDER	PAGE	BINDER	PAGE	34	95.0	34	95.04	34	96.15	34	96.17	34	96.38	34	96.52	48	70.1	34	70.2	48	70.3	48	70.44	45	73.108	46	203.0	46	203.2	46	203.3	46	203.4	46	203.5	46	203.6						
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46	203.5	46	203.6																																																
		28.0	3/2/93	3/9/93	PROVIDE A LIST AND DESCRIPTION OF ANY EXTERNAL AUDITS PERFORMED BY ALL AFFILIATED COMPANIES IN 1991 AND 1992. (NY)																																														

March 2, 1993

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AREA #	REQUEST #	DATE REQUESTED	DUE DATE	DESCRIPTION	DATE PROVIDED	FLA PRP.	POSSESSION OF	ESP	COM
	2	29.0	3/2/93	3/9/93	FOR ISC MEMBERSHIP, PROVIDE ANY INTERNAL AUDITS WHICH VERIFY THE PROPER USE OF PROJECT CODES OR AUDITS OF THE PROCESS. (RY)				
		30.0	3/2/93	3/9/93	FOR ALL AFFILIATED COMPANIES, PROVIDE A LIST OF ALL KEEP COST PROJECTS, THEIR DOLLAR AMOUNTS AND DESCRIPTIONS FOR EACH YEAR, 1991 AND 1992. (RY)				
		31.0	3/2/93	3/9/93	FOR ISC MEMBERSHIP, PROVIDE THE 2 OR 3 PAGE LIST OF FRI FACILITIES REFERRED TO BY GARY GRACE IN OUR MEETING ON FEBRUARY 24 FOR THE YEARS 1991 AND 1992. (RY)				
		32.0	3/2/93	3/9/93	FOR ISC, PROVIDE THE DETAIL OF TYPES OF PW CHARGES AND NON-AFFILIATE COMPANIES CHARGED. FOR AFFILIATES CHARGED USING THE PW CODE, PROVIDE THE TYPES OF CHARGES AND BILLING METHODOLOGY. (RY)				
		33.0	3/2/93	3/9/93	FOR ISC, PROVIDE THE DETAILED TRANSACTION REGISTERS FOR ALL OF 1991 AND 1992 FOR THE FEDERAL REGULATION, ADVERTISING, PUBLIC RELATIONS, AND EXTERNAL AFFAIRS COST CENTERS. (RY)				
		34.0	3/2/93	3/9/93	FOR ISC, PROVIDE A COPY OF THE THREE INVOICES FROM BELL SOUTH CORPORATION THAT WERE USED AS EXAMPLES AT OUR MEETING WITH GARY GRACE ON FEBRUARY 24. (RY)				
		35.0	3/2/93	3/9/93	FOR ISC, PROVIDE A LIST OF DIRECT PROJECTS AND A BRIEF DESCRIPTION OF EACH PROJECT PERFORMED BY ISC DURING 1991 AND 1992. ALSO PROVIDE AMOUNTS BILLED BY PROJECT. (RY)				
		36.0	3/2/93	3/9/93	FOR SUNLINK, PROVIDE A FLOW CHART OF THE SUNLINK ACCOUNTING PROCESS SIMILAR TO THE ISC FLOW CHART RECEIVED FROM GARY GRACE FEBRUARY 24. (RY)				
		37.0	3/2/93	3/9/93	ARE SUNLINK EXPENSES RECORDED IN A WAY IN WHICH PROJECT SPECIFIC COSTS CAN BE IDENTIFIED? (RY)				
		38.0	3/2/93	3/9/93	FOR SUNLINK, PROVIDE DETAIL OF HOW THE FULLY DISTRIBUTED COST WAS CALCULATED IN BILLING AFFILIATE COMPANIES FOR THE COLLOIAD USE. (RY)				
		39.0	3/2/93	3/9/93	PROVIDE THE MANUAL WHICH DESCRIBES BY ACCOUNT NUMBER, THE FUNCTION CODES THAT ARE IN EACH COST POOL. (RY)				
		40.0	3/2/93	3/9/93	PROVIDE A DESCRIPTION OF THE FLOW OF VOUCHERS FROM AFFILIATES FROM MAPS DOWN TO THE STATE LEVEL JOURNALS. SHOW WHERE THE REQUIRED SPLIT OCCURS. (RY)				
		41.0	3/2/93	3/9/93	CAN AFFILIATE BILLING VOUCHERS BE SPECIFICALLY IDENTIFIED ON A STATE LEVEL JOURNAL. (RY)				
		42.0	3/2/93	3/9/93	WHERE ARE THE COST POOL STUDIES PERFORMED? (COMPANY, STATE LEVEL) ARE THE PROGRAMS USED BEING DEVELOPED ON A STATE LEVEL? (RY)				

March 2, 1993

AREA #	REQUEST #	DATE REQUESTED	DUE DATE	DESCRIPTION	DATE PROVIDED	FLA PROP.	POSSESSION OF	BY	CR
2	43.0	3/2/93	3/9/93	*PROVIDE COPIES OF VOUCHERS ON THE ATTACHED LIST. (RY)					
	44.0	3/2/93	3/9/93	PROVIDE FLOWCHARTS FOR DCC, BSE, MAPS, AND THE DATA SERV ACCOUNTING BUSINESS. (RY)					
	45.0	3/2/93	3/9/93	PROVIDE PEC'S DEPARTMENT ASSIGNMENT (4) CHARACTER RESPONSIBILITY CODES BY DEPARTMENT. (RY)					
	46.0	3/2/93	3/9/93	WHO IS PROVIDING DATA CENTER REPAIRS NOW THAT DATA SERV LOST THE CONTRACT? IS IT AN AFFILIATE COMPANY? (RY)					
	47.0	3/2/93	3/9/93	PROVIDE A COPY OF THE DATA SERV ATLANTA REPAIR FACILITY COST CENTER STATEMENT FOR THE YEAR END 1991 AND 1992. (BE SURE TO INCLUDE REVENUES AND EXPENSES). (RY)					
	48.0	3/2/93	3/9/93	PROVIDE A COPY OF THE ANALYSIS PREPARED FOR THE DATA SERVE CENTERS OF COSTS FOR AFFILIATES VS. NON AFFILIATES. (RY)					
	49.0	3/2/93	3/9/93	PROVIDE A COPY OF THE ANALYSIS PREPARED FOR THE DATA SERVE CENTERS OF COSTS FOR AFFILIATES VS. NON AFFILIATES. (RY)					
4	23.0	3/2/93	3/9/93	PROVIDE THE FINANCIAL SYSTEM DOCUMENTATION FOR THE HP 2700 INCOME STATEMENT REPORT. (PG)					
5	3.1	3/2/93	3/9/93	PROVIDE THE CSPPS USER GUIDE. (AK)					

March 1, 1993

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P03

AREA #	REQUEST #	DATE REQUESTED	DUE DATE	DESCRIPTION	DATE PROVIDED	FLA PROP.	POSSESSION OF	EXP	COMMENT
4	017.0	3/1/93	3/8/93	PROVIDE DESCRIPTION OF THE WORK DONE BY THE BILLING AND COLLECTION PRODUCT TEAM AS LISTED IN RESPONSE TO ITEM 5-925.1 AND A COPY OF ALL REPORTS ISSUED BY THIS TEAM FOR THE YEARS 1990, 1991 AND 1992. (PG)					
	018.0	3/1/93	3/8/93	PROVIDE THE INTERSTATE SEPARATION FACTORS FOR ALL EXPENSE AND INVESTMENT ACCOUNTS ON REPORT WP2700 OF CARRIER ACCESS SERVICES REPORT FOR CARRIER BILLING SERVICES COLLUM FOR 1990, 1991 AND 1992. (PG)					
	019.0	3/1/93	3/8/93	IDENTIFY ANY SERVICES PURCHASED BY THE REGULATED OPERATIONS FROM AFFILIATES FOR USE IN PROVIDING BILLING AND COLLECTION SERVICES. A. IDENTIFY THE SPECIFIC SERVICE PURCHASE, THE AFFILIATED VENDOR AND THE COST INCURRED IN 1990, 1991 AND 1992. B. EXPLAIN HOW THE AMOUNT BILLED TO THE REGULATED OPERATIONS WAS DETERMINED.					
	020.0	3/1/93	3/8/93	PROVIDE THE INDEPENDENT AUDITORS CAN ATTESTATION WORKPAPERS FOR THE BROC FOR 1990, 1991 AND 1992. (PG)					
	021.0	3/1/93	3/8/93	PROVIDE COPIES OF BCT'S INTERNAL AUDITS RELATED TO THE BILLING AND COLLECTION PROCESS FOR 1990, 1991 AND 1992. (PG)					
	022.0	3/1/93	3/8/93	PROVIDE A LISTING OF ANY ALLOCATIONS OR ASSIGNMENTS OF COST OF THE BILLING AND COLLECTION OPERATIONS MADE OUTSIDE THE CAN PROCESS IN 1990, 1991 AND 1992. A. IDENTIFY ACCOUNTS. B. EXPLAIN WHY EACH ALLOCATION WAS MADE OUTSIDE THE CAN PROCESS. (PG)					

P006
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