

**NANCY B. WHITE**  
General Attorney

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

*920260-TL*

April 29, 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 Notice of Intent to Request Specified Confidential Classification. Please file these documents 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,  
*Nancy B. White*  
Nancy B. White (st)

Enclosures

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

*Jen*

*(Handwritten notes and stamps in the routing slip area)*

DOCUMENT NUMBER-DATE  
04692 APR 29 93  
FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE**  
**Docket No. 910163-TL**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this 29th day of April, 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

Nancy B. White  
(s)

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: April 29, 1993  
Telephone and Telegraph Company's )  
Repair Service Activities and )  
Reports )  
\_\_\_\_\_ )

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
NOTICE OF INTENT TO REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATION

COMES NOW BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), and files its Notice of Intent to Request Specified Confidential Classification.

1.

The Staff of the Florida Public Service Commission ("Staff") issued a Notice of Deposition in the referenced docket in order to take the deposition of several Southern Bell employees on April 19, 20, 21, 1993 at 666 N.W. 79th Avenue, Miami, Florida. The depositions of Clyde C. Borne, Charlie D. Chasteen, Diane F. Edwards, Patricia A. Moran, Hampton G. Booker, Nadine Thomas, and Douglas D. Marquis have now been transcribed.

2.

Some of the information contained in the depositions is proprietary. Included is information containing among other things, employee names, home addresses, home phone numbers, and business addresses and telephone numbers. This information is clearly confidential and proprietary under Florida Statutes, Section 364.183(f), which provides that "proprietary confidential business information" includes "employee personnel information"

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unrelated to compensation, duties, qualification, or responsibilities."

3.

The four areas of employee personnel information that are not, per se, confidential pursuant to Section 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 employee information provided in response to the deposition questions do not fit any of the exceptions and thus are, per se, confidential under Section 364.183(f), Florida Statutes.

4.

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 take possession of the deposition transcripts 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 Notice of Deposition is attached hereto.

Respectfully submitted this 29th day of April, 1993.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY

Harris R. Anthony  
HARRIS R. ANTHONY  
c/o Marshall M. Criser, III  
400 - 150 South Monroe Street  
Tallahassee, Florida 32301  
(305) 530-5555

R. Douglas Lackey  
R. DOUGLAS LACKEY  
NANCY B. WHITE  
4300 - 675 West Peachtree Street  
Atlanta, Georgia 30375  
(404) 529-5387

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the integrity of SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S repair service activities and reports. ) DOCKET NO. 910163-TL ) FILED: 04/14/93

NOTICE OF DEPOSITION

TO: Harris R. Anthony c/o Marshall M. Criser, III 150 South Monroe Street Suite 400 Tallahassee, Florida 32301

NOTICE is hereby given that the Staff of the Florida Public Service Commission will take the depositions of the following named individuals at 666 N.W. 79th Avenue, Miami, Florida, beginning Monday April 19, 1993 at 8:00 a.m. and continuing through Wednesday April 20, 1993 at 5:00 p.m.:

Monday April 19, 1993 Room 640

- \*8:00 am Borne, Clyde C.
8:45 am Luber, Edward V.
9:30 am Faller, John E.
10:30 am Brent, Wanda S.
\*11:15 am Chasteen, Charlie D.
\*1:00 pm Edwards, Diane F.
\*1:45 pm Moran, Patricia A.
\*2:30 pm Booker, Hampton G.
3:30 pm Minus, Kathleen D.
\*4:15 pm Thomas, Nadine

Tuesday April 20, 1993 Room 642

- 8:00 am Howarth, Dorothy R.
08:45 am Bates, Ronald P.
09:30 am Farmer, Laura D.
10:30 am Henry, Eileen M.
11:15 am Parker, Shirley V.
1:00 pm Robinson, Susie R.
1:45 pm Cole, Susan
2:30 pm Gray, Marjorie S.
\*3:30 pm Marquis, Douglas D.
4:15 pm Kassim, Raymond R.

Wednesday April 21, 1993 Room 640

- 8:00 am Littles, Geraldine H.
8:45 am Sanches, Dinah D.
9:30 am Shanaver, Frances T.
10:30 am Matthews, Kenneth R.
11:15 am Hernandez, Carmen
1:00 pm Sailer, John W.
1:45 pm Berman, Gregory K.
2:30 pm Staley, Dudley C.
3:30 pm Murphy, Patricia O.
4:15 pm Stephens, Harold E.
5:00 pm Andrade, Eduardo

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HQ REGULATORY-ATLA MIAMI LEGAL AKL

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NOTICE OF DEPOSITION  
DOCKET NO. 910163-TL  
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This deposition is being taken for purposes of discovery, for use at trial, or for any other purpose allowed under the Florida Rules of Civil Procedure and the Rules of the Florida Public Service Commission.

Please govern yourselves accordingly.

  
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JEAN R. WILSON  
Staff Counsel

FLORIDA PUBLIC SERVICE COMMISSION  
101 East Gaines Street  
Fletcher Building - Room 226  
Tallahassee, Florida 32399-0863  
(904) 487-2740

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the  
integrity of SOUTHERN BELL  
TELEPHONE AND TELEGRAPH  
COMPANY'S repair service  
activities and reports.

) DOCKET NO. 910163-TL  
)  
) ISSUED: 04/14/93  
)  
)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and copies of STAFF'S  
NOTICE OF DEPOSITION TO SOUTHERN BELL TELEPHONE AND TELEGRAPH  
COMPANY have been furnished by U.S. Mail this 14th day of April,  
1993 to the following:

Harris R. Anthony  
J. Phillip Carver  
R. Douglas Lackey  
Southern Bell Telephone  
and Telegraph Company  
c/o Marshall M. Criser, III  
150 S. Monroe Street  
Suite 400  
Tallahassee, FL 32301

Charles J. Beck  
J. Sue Richardson  
Office of Public Counsel  
c/o The Florida Legislature  
111 W. Madison Street  
Room 812  
Tallahassee, FL 32399-1400

Michael B. Twomey  
Assistant Attorney General  
Department of Legal Affairs  
Room 1603, The Capitol  
Tallahassee, FL 32399-1050

David M. Wells  
Robert J. Winicki  
William S. Graessle  
Mahoney, Adams & Criser  
3300 Barnett Center  
50 North Laura Street  
P.O. Box 4099  
Jacksonville, FL 32201

Michael W. Tye  
AT&T Communications of the  
Southern States, Inc.  
106 East College Avenue  
Suite 400  
Tallahassee, FL 32301

  
\_\_\_\_\_  
JEAN R. WILSON  
Staff Counsel

Florida Public Service Commission  
101 E. Gaines Street  
Tallahassee, FL 32399-0863  
(904) 487-2740