NANCY B. WHITE General Attorney

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

920260-12

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

910163-TI RE: Docket No.

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.

May 13, 1993

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 C :ificate of Service.

Sincerely,

Mancy B. White (01)

Jsures cc: All Parties of Record A. M. Lombardo H. R. Anthony R. D. Lackey Ko EIVED & FILED

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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 13th day of May, 1993 to: Robin Norton Charles J. Beck Division of Communications Deputy Public Counsel Florida Public Service Commission 111 W. Madison Street 101 East Gaines Street Room 812 Tallahassee, FL 32399-0866 Tallahassee, FL 32399-1400 Tracy Hatch Michael J. Henry Division of Legal Services Florida Public Svc. Commission MCI Center 101 East Gaines Street Three Ravinia Drive Tallahassee, FL 32399-0863 Joseph A. McGlothlin Richard D. Melson Hopping Boyd Green & Sams Vicki Gordon Kaufman McWhirter, Grandoff & Reeves Post Office Box 6526 315 South Calhoun Street Tallahassee, Florida Suite 716 atty for MCI Tallahassee, Florida 32301 Rick Wright atty for FIXCA Regulatory Analyst Joseph Gillan J. P. Gillan and Associates 101 East Gaines Street Post Office Box 541038 Tallahassee, FL 32399-0865 Orlando, Florida 32854-1038 Peter M. Dunbar Patrick K. Wiggins Haben, Culpepper, Dunbar Wiggins & Villacorta, P.A. & French, P.A. Post Office Drawer 1657 Tallahassee, Florida 306 North Monroe Street 32302 Post Office Box 10095 atty for Intermedia and Cox Tallahassee, FL 32301 atty for FCTA Laura L. Wilson, Esq. Messer, Vickers, Caparello, Chanthina R. Bryant Madsen, Lewis & Metz, PA Sprint Post Office Box 1876

Tallahassee, FL

atty for FPTA

32302

Office of the Public Counsel

MCI Telecommunications Corp. Atlanta, Georgia 30346-2102

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Division of Audit and Finance Florida Public Svc. Commission

3065 Cumberland Circle Atlanta, GA 30339

Michael W. Tye AT&T Communications of the Southern States, Inc. 106 East College Avenue Suite 1410 Tallahassee, Florida 32301 Dan B. Hendrickson Post Office Box 1201 Tallahassee, FL 32302 atty for FCAN Benjamin H. Dickens, Jr. Blooston, Mordkofsky, Jackson & Dickens 2120 L Street, N.W. Washington, DC 20037 Atty for Fla Ad Hoc C. Everett Boyd, Jr. Ervin, Varn, Jacobs, Odom & Ervin 305 South Gadsen Street Post Office Drawer 1170 Tallahassee, Florida 32302 atty for Sprint Florida Pay Telephone Association, Inc. c/o Mr. Lance C. Norris President Suite 202 8130 Baymeadows Circle, West Jacksonville, FL 32256 Monte Belote Florida Consumer Action Network 4100 W. Kennedy Blvd., #128 Tampa, FL 33609 Bill L. Bryant, Jr., Esq. Foley & Lardner Suite 450 215 South Monroe Street Tallahassee, FL 32302-0508 Atty for AARP

Michael B. Twomey Assistant Attorney General Department of Legal Affairs Room 1603, The Capitol Tallahassee, FL 32399-1050 Mr. Douglas S. Metcalf Communications Consultants, Inc. 631 S. Orlando Ave., Suite 250 P. O. Box 1148 Winter Park, FL 32790-1148 Mr. Cecil O. Simpson, Jr. General Attorney Mr. Peter Q. Nyce, Jr. General Attorney Regulatory Law Office Office of the Judge Advocate General Department of the Army 901 North Stuart Street Arlington, VA 22203-1837 Mr. Michael Fannon Cellular One 2735 Capital Circle, NE Tallahassee, FL 32308 Floyd R. Self, Esq. Messer, Vickers, Caparello, Madsen, Lewis, Goldman & Metz Post Office Box 1876 Tallahassee, FL 32302-1876 Attys for McCaw Cellular Angela Green Division of Legal Services Florida Public Svc. Commission 101 East Gaines Street Tallahassee, FL 32399-0863 Stan Greer Division of Legal Services Florida Public Svc. Commission 101 East Gaines Street Tallahassee, FL 32399-0863

Suzanne Summerlin Division of Legal Services Florida Public Svc. Commission 101 East Gaines Street Tallahassee, FL 32399-0863 Harold McLean Assistant Public Counsel Office of the Public Counsel 111 W. Madison Street Room 812 Tallahassee, FL 32399-1400

Nanay B. White

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 and Telegraph Company's Repair Service Activities and Reports

Docket No. 910163-TL Filed: May 13, 1993

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 Dorothy R. Howarth, Laura D. Farmer, Eileen M. Henry, Shirley V. Parker, Susie C. Robinson, Susan Cole, Marjorie S. Gray, and John E. Faller 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 persofileUMEnTormationTermation

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

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The four areas of employee personnel information that are not, <u>per se</u>, 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, <u>per se</u>, 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.

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Respectfully submitted this 13th day of May, 1993.

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SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

Hamis R. ANTHONY HARRIS R. ANTHONY C/O Marshall M. Criser, III 400 - 150 South Monroe Street Tallahassee, Florida 32301 (305) 530-5555 The August Market R. DOUGLAS LACKEY

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

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TEFORE THE PLORIDA FUELIO SERVICE CONTINUES

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

ADELON OF DEPOSITION

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

FORICH is hereby given that the Staff of the Fleride 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.t

Monday April 19, 1993 Room 640

S:00 an Borne, Clyde G. S:45 an Luber, Edward V. S:30 an Faller, John S. 10:30 an Brent, Wanda S. 11:15 an Chasteen, Charlie D 1:00 pu Movards, Diane F. 1:45 pm Movan, Patricia A. 2:30 pm Movan, Patricia A. 2:30 pm Movan, Rathieen D. 4:15 pm Themas, Badine Tuesday April 20, 1993 Room 642

Howarth, Dorothy R.
m Bates, Ronald F. m Farmer, Laura D.
m Henry, Hileen M.
m Parker, Shirley V.
Robinson, Susia R.
Cole, Susan
Gray, Marjorie S.
Marquis, Douglas D.
Rassin, Raymond R.

"Mednesday April 21, 1993 Room 640

8:00 an Littles, Geraldine E. 5:45 an Sanches, Dinch D. 9:30 an Shanaver, Frances T. 10:30 an Matthews, Konneth R. 11:15 an Hernandes, Cormen 1:00 pe Seiler, John W. 1:45 pm Seiler, John W. 1:45 pm Staley, Dudley C. 3:30 pm Staley, Dudley C. 3:30 pm Staley, Patricia C. 4:15 pu Stephens, Harold H. 5:00 pm Andrade, Eduardo

******** 505

06-13-93 11:03 AM FROM BST 404-614-4064

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NOTICE OF DEPOSITION DOCKET NO. 910163-TL PAGE 2

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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Staff Counsel

FLORIDA PUBLIC SURVICE COMMISSION 101 East Gaines Street Flatcher Building - Room 326 Tallahassee, Florida 32399-0863 (904) 487-2740

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TEL NO:

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BEFORE WHE PLORIDA PUBLIC SERVICE CONDISISION

In re: Investigation into the integrity of SOUTHERN ABLL TELEPHONE AND TELEGRAPH OCHPANY'S repair service DOCKET NO. 910163-21 IS#UND: 04/14/93 activities and reports.

GARTIFICATE OF SERVICE

I REARRY CERTIFY that the original and copies of SUAPFIS MOTICE OF DEPOSITION TO SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY have been furnished by U.S. Mail this 14th day of April, 1981 to the following:

Herris R. Anthony J. Phillip Carver R. Douglas Lackay Southern Bell Telephono and Telegraph Company c/o Marshall M. Criser, III 150 S. Monroe Street Buite 400 Tellahasses, FL 33301

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

Michael W. Tye **XTAT Communications** of the Southern States, Inc. 105 Bast College Avenua Suite 400 Tellahapsee, FL 32301

Charles J. Beck J. Sue Richardson Office of Public Counsel 0/0 The Flerida Legislature 111 W. Madison Street Room 812 Tallahassae, FL 32399-1400

David'M. Wells Robert J. Winiski William S. Graessie Mahoney, Adams & Oriser 3300 Bernatt Center 50 North Laura Street P.O. BOX 4099 Jacksonville, FL 32201

our es JEAN R. WILSON Staff Counsel

Florida Jublic Service Commission 101 I. Gaines Street Tallahasson, FL 32399-0463 (904) 487-2740

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