

J. Phillip Carver  
General Attorney

U.S. MAIL  
FILE COPY

Southern Bell Telephone  
and Telegraph Company  
c/o Marshall M. Criser III  
Suite 400  
150 So. Monroe Street  
Tallahassee, Florida 32301  
Phone (305) 530-5558

August 12, 1993

920260-TL

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 Service Investigation

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Notice of Intent to Request Specified Confidential Classification, which we ask that you file in the 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 to the parties shown on the attached Certificate of Service.

ACK ✓  
ASB \_\_\_\_\_  
APP \_\_\_\_\_  
C.F. \_\_\_\_\_  
C.M. \_\_\_\_\_  
C.S. \_\_\_\_\_

Sincerely yours,  
*J. Phillip Carver*  
J. Phillip Carver

Enclosures

cc: All Parties of Record  
A. M. Lombardo  
1 Harris R. Anthony  
6 R. Douglas Lackey  
1  
1

KJ J8

DISC-CONTROL OF RECORDS

A BELL SOUTH Company

DOCUMENT NUMBER-DATE

08732 AUG 12 93

RECORDS/REL. DIVISION

**CERTIFICATE OF SERVICE**

**Docket No. 920260-TL**

**Docket No. 910163-TL**

**Docket No. 910727-TL**

**Docket No. 900960-TL**

I HEREBY CERTIFY that a copy of the foregoing has been  
furnished by United States Mail this 12<sup>th</sup> day of August, 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  
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Stan Greer  
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Florida Public Svc. Commission  
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Tallahassee, FL 32399-0863

*J. Phillip Carver* (2)

ORIGINAL  
FILE COPY

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: August 12, 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 pursuant to Rule 25-22.006, Florida Administrative Code, files its Notice of Intent to Request Specified Confidential Classification.

1. The Office of Public Counsel ("Public Counsel") issued a Notice of Deposition in the above-referenced docket in order to take the depositions of Southern Bell employees on June 22, 23, 24, and 28, 1993 in Pompano and Hollywood, Florida. The depositions of the following employees who were deposed at the above-noted dates have been transcribed and were received by Southern Bell on August 11, 1993: Mario Martinez, Robert Fecht, Marguerite Winter, Linda Henry, Robert Madden, Patricia Phelan, Linda Moss, Timothy Keating, and William Farbarik.

DOCUMENT NUMBER-DATE

08732 AUG 12 83

REGISTRATION

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

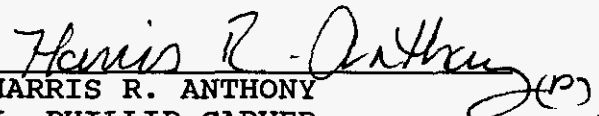
3. The four areas of employee personnel information that are not, per se, confidential pursuant to Section 364.183(f), Florida Statutes, are compensation duties, qualifications, and responsibilities of an employee. A common sense reading of this list demonstrates that the employee-specific information 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.

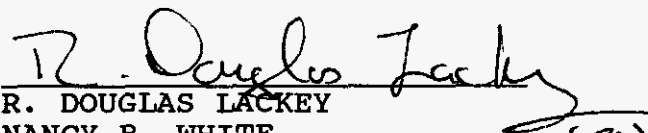
4. Because this information contains proprietary information, Southern Bell is filing this Notice of Intent to Request Specified Confidential Classification, pursuant to Rule 25-22.006(3)(a)(b)(5), Florida Administrative Code, in order to allow the Staff to take possession of the deposition transcripts 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. Public Counsel's Notice of Deposition is attached hereto.

Respectfully submitted this 12th day of August, 1993.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY

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

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

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  
FILED: June 11, 1993

NOTICE OF DEPOSITION UPON ORAL EXAMINATION

TO: Harris R. Anthony, Esq.  
c/o Marshall M. Criser III  
BellSouth Telecommunications, Inc.  
d/b/a/ Southern Bell Telephone &  
Telegraph Company  
150 S. Monroe Street  
Tallahassee, FL 32301

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 depositions of the following BellSouth employees as shown on the attached schedule in Pompano and Hollywood:

R. Anderson, N. Blaney, Charlotte Brewer, Maria Britten, Kae P. Brooks, William Farbarik, Robert Fecht, Mary Flanagan, L. Henry, Janis L. Hurt, T. Keating, JoAnne Knowles, Robert E. Little, Carla Lockerd, Maria B. Luongo, Robert Madden, Mario Martinez, Nicole Maxfield, R.D. McDonough, L. Moss, M. Patrognani, Patricia Phelan, R. Rich, Ivan Roberts, D. Schena, Mark A. Sheaf, Robert Wells, M. Winter.

The depositions, which are for the purpose of discovery and such other purposes as are permitted by the Florida Rules of Civil Procedure, will cover the customer repair and rebate systems and any other matters related to the consolidated rate case docket 920260-TL.

HQ REGULATORY-ATLA  
MIAMI LEGAL  
AML

FAX \_\_\_\_\_ FED X

**RECEIVED**

JUN 14 1993

U.S. MAIL - REG. RELATIONS  
TALLAHASSEE, FL

The depositions are scheduled at the following locations and times indicated:

Tuesday, June 22 - Wednesday, June 23, 1993, at 8:30 a.m.  
Southern Bell Telephone & Telegraph Company  
1230 N. Federal Highway  
Pompano, Florida

Thursday, June 24 - Monday, June 28, 1993 at 8:30 a.m.  
Southern Bell Telephone & Telegraph Company  
250 S.W. 62nd Avenue  
Hollywood, Florida

Dated this 11th day of June 1993.

  
JANIS SUE RICHARDSON  
Associate 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



NORTH BROWARD-1230 N. Federal Highway, Pompano

|            | <u>June 22</u>  | <u>June 23</u>    |
|------------|-----------------|-------------------|
| 08:30 a.m. | Blaney, N.      | Henry, L.         |
| 09:45 a.m. | Moss, L.        | Keating, T.       |
| 11:00 a.m. | Rich, R.        | Schena, D.        |
| 12:15 p.m. | Lunch           | Lunch             |
| 01:15 p.m. | Winter, M.      | Farbarik, William |
| 02:30 p.m. | Anderson, R.    | Fecht, Robert     |
| 03:45 p.m. | Martinez, Mario | Madden, Robert    |

SOUTH BROWARD-250 S.W. 62nd Avenue, Hollywood

|            | <u>June 24</u>    | <u>June 25</u>    | <u>June 28</u> |
|------------|-------------------|-------------------|----------------|
| 08:30 a.m. | Little, Robert E. | Brewer, Charlotte | Roberts, Ivan  |
| 09:45 a.m. | Britten, Maria    | Brooks, Kae P.    | Hurt, Janis    |
| 11:00 a.m. | Flanagan, Mary    | Luongo, Maria B.  | Lockerd, C.    |
| 12:15 p.m. | Lunch             | Lunch             | Wells, Robert  |
| 01:15 p.m. | Phelan, Patricia  | McDonough, R.D.   |                |
| 02:30 p.m. | Patrognani, M.    | Knowles, JoAnne   |                |
| 03:45 p.m. | Maxfield, Nicole  | Sheaf, Mark A.    |                |

**CERTIFICATE OF SERVICE  
DOCKET NO. 920260-TL**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail or hand-delivery to the following parties on this 11th day of June, 1993.

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Florida AARP Capital City Task  
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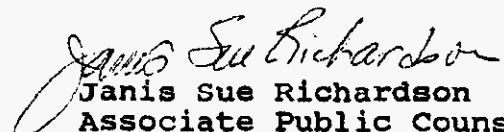
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