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August 27, 1993

ORIGINAL
FILE COPY

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

Dear Mr. Tribble:

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

Enclosures

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

RECEIVED & FILED

JR
FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

09269 AUG 27 83

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 27th day of August, 1993 to:

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

Charles J. Beck
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Nancy B. White (e)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of)
the Revenue Requirements and Rate) Docket No. 920260-TL
Stabilization Plan of Southern)
Bell Telephone and Telegraph) Filed: August 27, 1993
Company)

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 its Thirty-First Request for Production of Documents in the above-referenced docket, as well as in Docket Nos. 910163-TL and 900960-TL, in order to obtain documents provided by Southern Bell to the Attorney General or Statewide Prosecutor. Access to these documents was provided by Southern Bell to both the Staff and Public Counsel, who have now requested copies of certain of these documents.

2. Some of the information contained in the documents 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."

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FPSC-RECORDS/REPORTING

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 documents 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 Thirty-First Request for Production of Documents is attached hereto.

Respectfully submitted this 27th day of August, 1993.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

OCT 26 1992

In re: Investigation into the)
Integrity of Southern Bell's) Docket No. 910163-TL
Repair Service Activities and)
Reports)

In re: Show Cause proceeding against)
Southern Bell Telephone and Telegraph) Docket No. 900960-TL
Company for misbilling customers)

Comprehensive Review of the)
Revenue Requirements and Rate) Docket No. 920260-TL
Stabilization Plan of Southern) Filed: October 22, 1992
Bell Telephone & Telegraph Company)

CITIZENS' THIRTY-FIRST SET OF REQUESTS FOR PRODUCTION
OF DOCUMENTS TO BELLSOUTH TELECOMMUNICATIONS, INC.

Pursuant to Section 350.0611(1), Fla. Stat. (1991), Rules 25-22.34 and 25.22.35, F.A.C., and Rule 1.350, F.R.C.P., Florida's Citizens' ("Citizens"), by and through Jack Shreve, Public Counsel, request BellSouth Telecommunications, Inc. ("BellSouth") d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell") to produce the following documents for inspection and copying at the Office of Public Counsel, Claude Pepper Building, 111 West Madison Street, Room 812, Tallahassee, Florida 32399-1400, on or before Monday, November 23, 1992, or at such other time and place as may be mutually agreed upon by counsel.

INSTRUCTIONS

1. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which privilege is claimed, together with the following information: date, sender, recipients, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

2. If BellSouth has possession, custody, or control of the originals of the documents requested, please produce the originals or a complete copy of the originals and all copies which are different in any way from the original, whether by interlineation, receipt stamp or notation. If BellSouth does not have possession, custody, or control of the originals of the documents requested, please produce any copies in the possession, custody, or control, however made, of BellSouth.

3. Please construe "and" as well as "or" either disjunctively or conjunctively as necessary to bring within the scope of this production of documents any document which might otherwise be construed to be outside the scope.

4. If you object to any discovery requests, in whole or part, on the basis of confidentiality, please strictly follow the provisions of Florida Public Service Commission Rule 25-22.006 requiring a motion for a protective order no later than the date

the response is otherwise due and urging all parties to seek mutual agreement before bringing a controversy to the Commission.

5. Unless otherwise indicated in the discovery request, only documents created on or after January 1, 1990 are requested.

6. The Citizens specifically request the company to make a review of the files of employees reasonably expected to have information responsive to these document requests. Correspondence and notes of meetings, whether typed or handwritten, are specifically requested. If a particular employee is in charge of an area related to a document request, the Citizens request the company to search the files both of the employee in charge of the area as well as each employee reporting directly or indirectly to such person if their areas of responsibility also include matters reasonably likely to be responsive to the document request.

7. The Citizens specifically request the company to make a review of the files of employees reasonably expected to have information responsive to these document requests. Correspondence and notes of meetings, whether typed or handwritten, are specifically requested. If a particular employee is in charge of an area related to a document request, the Citizens request the company to search the files both of the employee in charge of the area as well as each employee reporting directly or indirectly to

such person if their areas of responsibility also include matters reasonably likely to be responsive to the document request.

8. Please identify each document or set of documents produced in response to this request, by the number of the request. For example; on a document produced for number 1 of the first request, write "responsive to Citizens' First Production of Document Request #1," or "1st POD #1."

9. For sets of documents, e.g. DLETHs or customer billing reports, numerical or alphabetical sequence, please include a description of the sequence or order of the documents and identify the individual or individuals who provided the information or helped in providing the information.

10. For documents produced especially off microfiche, please be sure that all copies are legible.

11. SORTING and ORDERING of INFORMATION. The DLETHs and billing information requested should be sorted according to the order of appearance in the reports provided or produced and be attached to each report. Citizens should not have to resort or reorganize any of the information received. Citizens should be able to pick up any page of any report and find attached to it the corresponding DLETHs and/or billing information in the same order as the telephone number or line record appearing on the

corresponding report. For example, page 1 of the first operational review produced may have 25 telephone numbers listed. Attached to that page should appear the 25 DLETHs and corresponding OC&C billing statement pages that correspond to each of those 25 telephone numbers. The DLETHs and billing statement pages should be sorted in the same order as the 25 telephone numbers listed on page 1 of the review.

12. The company does not need to reproduce any document that has already been produced in any of the three dockets listed in the caption. The company should note in each specific response the title, date, and a general description of any responsive document not being reproduced.

DEFINITIONS

1. "Document" or "documents" means any written, recorded, filmed or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device or any other media, including, but not limited to, memoranda, notes, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, and notes, any of which are in your possession, custody, or control.

2. As used herein "you" and "your" means BellSouth Telecommunications, Inc., together with its officers, employees, consultants, agents, representatives, attorneys (unless privileged), and any other person or entity acting on behalf of BellSouth.

3. Words in the past tense include the present, and words in the present tense include the past. Use of the singular includes the plural, and use of the masculine includes the feminine where appropriate, and vice versa.

DOCUMENTS REQUESTED

1. Please produce all network operational reviews of Installation and Maintenance Center operations, e.g. staff reviews/operational audits/key results reviews/quarterly reviews, done since 1985 to present and not already produced.

2. Please produce all DLETHs that correspond to each record checked in each of the reviews produced under item 1 AND in identical corresponding order to each page of each review, AND attached to the corresponding review.

3. For each telephone number that is listed on each review provided under item 1 above, please provide evidence of whether that customer received a rebate for that out-of-service trouble, the amount of any rebate, and the billing date of any rebate. This may be provided as a copy of the OC&C statement of the corresponding billing statement, or as a separate listing [see Citizens' 31st Interrogatory, item 1] prepared by the company. In either case, the information, like the DLETHs, should be provided in the same order as the listed numbers on each page of each review and attached to its corresponding review.

4. Please provide all statistical/analytical reports that evaluate clearing times that are twelve (12) or more hours earlier

than the actual closing times for out-of-service trouble reports from January 1, 1985 to present.

5. Please provide all DLETHs that correspond to the clearing/closed reports requested in item 4 above, AND produce the DLETHs in the same order that the record appears in the clearing/closed reports provided, AND attach the DLETHs to each of their corresponding clearing/closed report.

6. For each telephone number that is listed on each clearing/closed report provided under item 4 above, please provide evidence of whether that customer received a rebate for that out-of-service trouble, the amount of any rebate, and the billing date of any rebate. This may be provided as a copy of the OC&C statement of the corresponding billing statement, or as a separate listing [see Citizens' 31st Interrogatory, item 7] prepared by the company. In either case, the information, like the DLETHs, should be provided in the same order as the listed numbers on each page of each review and attached to its corresponding review.

7. Please provide all statistical/analytical reports analyzing the use of the CON (carried over no) intermediate status code on out-of-service trouble reports throughout all of the company's Florida network operations beginning with January 1, 1985 to present.

8. Please provide all DLETHs that correspond to the carried over no (CON) reports requested in item 7 above, AND produce the DLETHs in the same order that the record appears in the CON report provided, AND attach the DLETHs to their corresponding section of each CON report.

9. For each telephone number that is listed on each carried over no report provided under item 7 above, please provide evidence of whether that customer received a rebate for that out-of-service trouble, the amount of any rebate, and the billing date of any rebate. This may be provided as a copy of the OC&C statement of the corresponding billing statement, or as a separate listing [see Citizens' 31st Interrogatory, item 8] prepared by the company. In either case, the information, like the DLETHs, should be provided in the same order as the listed numbers on each page of each review and attached to its corresponding review.

10. Please provide all statistical and analytical reports prepared and produced for the Attorney General or the Statewide Prosecutor. The company does not need to produce any document already produced in any of these dockets.

11. Please provide all supporting documents to the reports in item 10 [Attorney General or Statewide Prosecutor reports] above. These documents should be produced in corresponding order to

information listed on the reports and attached to each corresponding report.

12. Please provide all documents prepared by the company that analyze, compare, discuss and/or refer to the documents and reports produced to the Attorney General or Statewide Prosecutor in items 10 and 11 above.

13. Please provide the DLETHs that correspond to each customer's trouble report identified in OPC's TOK Report produced for Citizens' 31st Interrogatory, item 4. DLETHs should be in the same order as their corresponding record in the TOK report AND be attached to the corresponding page of the report.

14. For each telephone number that is listed on OPC's TOK Report provided under Citizens' 31st Interrogatory, item 4, please provide evidence of whether that customer received a rebate for that out-of-service trouble, the amount of any rebate, and the billing date of any rebate. This may be provided as a copy of the OC&C statement of the corresponding billing statement, or as a separate listing [see Citizens' 31st Interrogatory, item 9] prepared by the company. In either case, the information, like the DLETHs, should be provided in the same order as the listed numbers on each page of each review and attached to its corresponding review.

15. Please provide all DLETH's that correspond to the OOS > 24 hours Excluded Report provided for Citizens' 31st Interrogatory, item 5, in the same order as the customer record appears in the report and attach the DLETHs to the corresponding page of the report.

16. For each customer telephone number/line record identified on the OOS > 24 hours Excluded Report (Citizens' 31st Interrogatory, item 5 and corresponding DLETHs in item 15 above), provide evidence of whether that customer received a rebate for that out-of-service trouble, the amount of any rebate, and the billing date of any rebate. This may be provided as a copy of the OC&C statement of the customer's billing statement, or as a separate listing prepared by the company (see Citizens' 31st Interrogatory, item 6). In either case, the information, like the DLETHs, should be provided in the same order as the listed telephone numbers/line records on each page of the report and attached to their corresponding page.

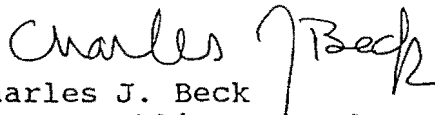
17. Please provide all DLETHs that correspond to "OPC's Clearing/Closing Time Report" requested in Citizens' 31st Interrogatory, item 2, AND produce the DLETHs in the same order that the record appears in the clearing/closed report provided, AND attach the DLETHs to each page of their corresponding clearing/closed report.

18. For each customer telephone number/line record identified on OPC's Clearing/Closing Time Report (Citizens' 31st Interrogatory, item 2 and corresponding DLETHs in item 17 above), provide evidence of whether that customer received a rebate for that out-of-service trouble, the amount of any rebate, and the billing date of any rebate. This may be provided as a copy of the OC&C statement of the customer's billing statement, or as a separate listing prepared by the company (see Citizens' 31st Interrogatory, item 10). In either case, the information, like the DLETHs, should be provided in the same order as the listed telephone numbers/line records on each page of the report and attached to their corresponding page.

19. Please provide all DLETHs that correspond to OPC's CON Report requested in Citizens' 31st Interrogatory, item 3, AND produce the DLETHs in the same order that the record appears in the CON report provided, AND attach the DLETHs to their corresponding section of each CON report.

20. For each customer telephone number/line record identified on OPC's CON Report (Citizens' 31st Interrogatory, item 3 and corresponding DLETHs in item 19 above), provide evidence of whether that customer received a rebate for that out-of-service trouble, the amount of any rebate, and the billing date of any rebate. This may be provided as a copy of the OC&C statement of the customer's billing statement, or as a separate listing prepared by the company

(see Citizens' 31st Interrogatory, item 11). In either case, the information, like the DLETHs, should be provided in the same order as the listed telephone numbers/line records on each page of the report and attached to their corresponding page.


Charles J. Beck
Deputy Public Counsel

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION 26 1992

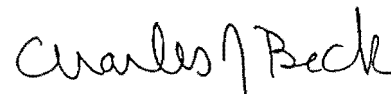
In re: Investigation into the)
Integrity of Southern Bell's) Docket No. 910163-TL
Repair Service Activities and)
Reports)

In re: Show Cause proceeding against)
Southern Bell Telephone and Telegraph) Docket No. 900960-TL
Company for misbilling customers)

Comprehensive Review of the)
Revenue Requirements and Rate) Docket No. 920260-TL
Stabilization Plan of Southern) Filed: October 22, 1992
Bell Telephone & Telegraph Company)

NOTICE OF SERVICE

The Citizens of Florida ("Citizens"), by and through Jack Shreve, Public Counsel, serve this notice that the Citizens have served their Thirty-First Set of Requests for Production of Documents and Thirty-First Set of Interrogatories to BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell") on Thursday, October 22, 1992.


Charles J. Beck
Deputy Public Counsel

CERTIFICATE OF SERVICE
DOCKET NO. 910163-TL

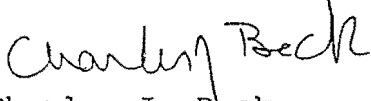
I HEREBY CERTIFY that a correct copy of the foregoing has been furnished by U.S. Mail or *hand-delivery to the following persons on this 22nd day of October, 1992.

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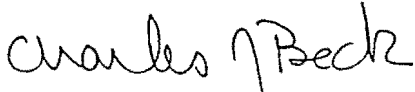
CERTIFICATE OF SERVICE
Docket No. 900960-TL

I HEREBY CERTIFY that a correct copy of the foregoing has been furnished by U.S. Mail or hand-delivery to the following persons this 22nd day of October, 1992.

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Charles J. Beck
Deputy Public Counsel

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 22nd day of October, 1992.

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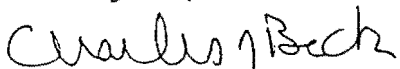
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