

JACK SHREVE PUBLIC COUNSEL

STATE OF FLORIDA

OFFICE OF THE PUBLIC COUNSEL



c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, Florida 32399-1400 904-488-9330

November 12, 1993

Steve Tribble, Director Division of Records and Reporting Florida Public Service Commission 101 East Gaines Street Tallahassee, FL 32399-0850

Re: Docket No. 920260-TL

Dear Mr. Tribble:

OTH _____

Enclosed for filing in the above-referenced docket on behalf of the Citizens of the State of Florida are three copies of the Citizens' Notice of Deposition Duces Tecum of Carl Vinson.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

ACK	
AFA	Sincerely,
APP	Charles 1Bado
CAF	Charles J. Beck Deputy Public Counsel
CMU	
CTR /	• • • • • • • • • • • • • • • • • • • •
Enclosures EAG	
LEG L	
LIN	
OPC	
RCH	
SEC	
WAS	

DOCUMENT NUMBER-DATE

12243 HOV 128

FPSC-RECORDS/REPURTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION



Comprehensive Review of the Revenue Requirements and Rate Stabilization Plan of Southern Bell Telephone & Telegraph Company

Docket No. 920260-TL Filed: November 12, 1993

NOTICE OF DEPOSITION DUCES TECUM OF CARL VINSON

To: Mr. Tracy Hatch
Division of Legal Services
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida

Pursuant to Florida Rule of Civil Procedure 1.310, the Citizens of Florida, by and through Jack Shreve, Public Counsel, will take the sworn deposition upon oral examination of Carl Vinson for purposes of discovery and such other purposes as are permitted by the Florida Rules of Civil Procedure. Please bring to the deposition all of Mr. Vinson's workpapers and source documents underlying the management audit of Southern Bell's contact sales methods and controls dated October, 1993.

The deposition will be taken at the Office of Public Counsel, 111 West Madison Street, room 812, Tallahassee, Florida commencing at 9:00 a.m. on Thursday, November 18, 1993.

Charles J. Beck

Deputy Public Counsel

Office of Public Counsel c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, FL 32399-1400 (904) 488-9330

Attorney for the Citizens of the State of Florida

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 12th day of November, 1993.

Marshall Criser, III
BellSouth Telecommunications,
Inc. (Southern Bell Telephone & Telegraph Company)
150 S. Monroe St., Suite 400
Tallahassee, FL 32301

Harris R. Anthony
BellSouth Telecommunications,
Inc. (Southern Bell Telephone & Telegraph Company)
150 W. Flagler St., Suite 1910
Miami, FL 33130

Robin Norton Division of Communications Fla. Public Service Commission 101 East Gaines Street Tallahassee, FL 32301

Doug Lackey
BellSouth Telecommunications,
Inc. (Southern Bell Telephone & Telegraph Company)
4300 Southern Bell Center
Atlanta, GA 30375

Michael A. Gross Department of Legal Affairs Attorney General The Capitol Bldg., PL-01 Tallahassee, FL 32399-1050

Laura L. Wilson c/o Florida Cable Television Association, Inc. P.O. Box 10383 310 N. Monroe Street Tallahassee, FL 32302 Angela Green
Tracy Hatch
Jean Wilson
Division of Legal Services
Fla. Public Service Commission
101 East Gaines Street
Tallahassee, FL 32301

Edward Paschall
Florida AARP Capital City Task
Force
1923 Atapha Nene
Tallahassee, FL 32301

The American Association of Retired Persons c/o Donald L. Bell 104 E. Third Avenue Tallahassee, FL 32303

Richard D. Melson Hopping, Boyd, Green & Sams 23 South Calhoun Street P.O. Box 6526 Tallahassee, FL 32314

Michael J. Henry MCI Telecommunications Corp. 780 Johnson Ferry Road Suite 700 Atlanta, GA 30342

Lance C. Norris, President Florida Pay Telephone Assn., Inc. 315 S. Calhoun Street Barnett Bank Bldg., Suite 710 Tallahassee, FL 32302 Joseph A. McGolthlin Vicki Gordon Kaufman McWhirter, Grandoff & Reeves 315 S. Calhoun Street, Suite 716 Tallahassee, FL 32301

Rick Wright AFAD Fla. Public Service Commission 101 East Gaines Street Tallahassee, FL 32301

Dan B. Hendrickson P.O. Box 1201 Tallahassee, FL 32302

Monte Belote Florida Consumer Action Network 4100 W. Kennedy Blvd., #128 Tampa, FL 33609

Cecil O. Simpson, Jr.
Peter Q. Nyce, Jr.
Regulatory Law Office
Office of the Judge Advocate
General
Department of the Army
901 North Stuart St.
Arlington, VA 22203-1837

Michael Fannon Cellular One 2735 Capital Circle, NE Tallahassee, FL 32308 C. Everett Boyd, Jr.
Ervin, Varn, Jacobs, Odom & Ervin
305 S. Gadsden Street
P.O. Drawer 1170
Tallahassee, FL 32302

Chanthina R. Bryant Sprint 3065 Cumberland Circle Atlanta, GA 30339

Michael W. Tye
AT&T Communications of the
Southern States, Inc.
106 East College Avenue
Suite 1410
Tallahassee, FL 32301

Florida Hotel and Motel Assn. c/o Thomas F. Woods Gatlin, Woods, Carlson & Cowdery 1709-D Mahan Drive Tallahassee, FL 32308

Douglas S. Metcalf Communications Consultants, Inc. P.O. Box 1148 Winter Park, FL 32790-1148

Benjamin H. Dickens, Jr.
Blooston, Mordkofsky, Jackson & Dickens
2120 L Street., N.W.
Washington, DC 20037

Floyd R. Self Messer, Vickers, Caparello, Lewis, Goldman & Metz, P.A. P.O. Box 1876 Tallahassee, FL 32302-1876

Charles J. Beck
Deputy Public Counsel