

**ORIGINAL
FILE COPY**

Harris R. Anthony
General Attorney-Florida

Southern Bell Telephone
and Telegraph Company
Legal Department
c/o Marshall Criser
Suite 400
150 South Monroe Street
Tallahassee, Florida 32301
Phone (305) 530-5555

April 3, 1991

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 Response to Staff's First Request for Production of Documents and Notice of Intent to Request 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 _____
AFA _____
APP _____
CAF _____

Sincerely yours,
Harris R. Anthony
Harris R. Anthony
(24)

CMU Enclosures

CTR _____
EAG cc: All Parties of Record
A. M. Lombardo
LEG LW/m R. Douglas Lackey

LIN 6

CPC _____

RCH RECEIVED & FILED

SEC 1

WAS KF
FPSC-BUREAU OF RECORDS

OTH Kay

DOCUMENT NUMBER-DATE

03281 APR-3 1991

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

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this *3rd* day of *April*, 1991,
to:

Charles J. Beck
Assistant Public Counsel
Office of the Public Counsel
111 W. Madison Street
Room 812
Tallahassee, FL 32399-1400

Robert Vandiver
Division of Legal Services
Florida Public Svc. Commission
101 East Gaines Street
Tallahassee, FL 32399-0863

Tracy Hatch
Division of Legal Services
Florida Public Svc. Commission
101 East Gaines Street
Tallahassee, FL 32399-0863

Harrio P. Anthony
(24)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition on behalf of Citizens)
of the State of Florida to initiate)
investigation into integrity of) Docket No. 910163-TL
Southern Bell Telephone and Telegraph)
Company's repair service activities) Filed: April 3, 1991
and reports.)
_____)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
AND NOTICE OF INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION

COMES NOW, Southern Bell Telephone and Telegraph Company
("Southern Bell" or "Company") and files: (1) its Response to
the Staff's First Request for Production of Document; and (2) its
Notice of Intent to Request Confidential Classification.

GENERAL RESPONSE

Many of the documents that will be delivered to and reviewed
by Florida Public Service Commission Staff ("Staff") contain
proprietary confidential business information which should not be
publicly disclosed. Because these documents contain proprietary
confidential classification, Southern Bell is filing this Notice
of Intent to Request Confidential Classification in order to
allow the Staff to take possession of the documents concurrent
hereto. The filing of this Notice exempts the documents from the
provisions of Section 119.07(1), Florida Statutes, for twenty-one
days from the date of the filing of this Notice, pending the
filing of a Request for Specified Confidential Classification
with the Commission's Division of Records and Reporting. The

DOCUMENT NUMBER-DATE

03281 APR-3 1991

...-RECORDS/REPORTING

original of this Notice has been filed with the Division of Records and Reporting, and a copy has been served on a Staff Attorney with the Commission's Office of the General Counsel in accord with Rule 25-22.006(3)(a).

SPECIFIC RESPONSE

1. At a meeting at which, inter alia, counsel for Staff and Southern Bell were in attendance, it was agreed that Staff would modify its Request No. 1 and that until such time Southern Bell would not be required to respond to the unmodified version of Request No. 1. Southern Bell has not yet received the modified request so that it may respond appropriately. To the extent that any modified version of Request No. 1 seeks confidential proprietary business information, Southern Bell reserves the right to make a request for confidentiality regarding such information.

2. Southern Bell will produce for inspection and copying, at a mutually agreeable time and place, all documents currently available that are responsive to Staff's Request No. 2. Certain other documents that may be responsive to Request No. 2 are not yet completed. Upon their completion, Southern Bell will supplement appropriately its response to Request No. 2.

3. Southern Bell has not yet provided any documents to Public Counsel in this docket and thus there are now no documents responsive to Request No. 3.

4. Pursuant to agreement between counsel for the Staff and counsel for Southern Bell, Southern Bell will produce for inspection and copying, at a mutually agreeable time and place, all higher level management complaints responsive to Request No. 4. Southern Bell will further produce any backup records relating to such responsive written complaints to the extent such records are available to Southern Bell.

5. At a meeting at which, inter alia, counsel for Staff and Southern Bell were in attendance, it was agreed that Staff would modify its Request No. 5 and that until Staff so modified Request No. 5, Southern Bell would not be required to respond to the unmodified version of Request No. 5. Southern Bell has not yet received the modified request so that it may respond appropriately. To the extent that any modified version of Request No. 5 seeks confidential proprietary business information, Southern Bell reserves the right to make a request for confidentiality regarding such information.

6. Southern Bell will produce for inspection and copying, at a mutually agreeable time and place, the documents, to the

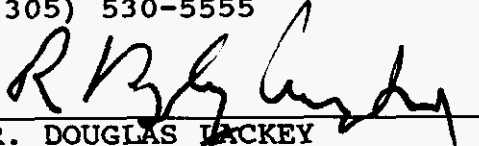
extent available, responsive to Request No. 6.

Respectfully submitted,

SOUTHERN BELL TELEPHONE AND
TELEGRAPH COMPANY



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