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# Southern Bell

Mary Jo Peed  
Attorney

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4300 Southern Bell Center  
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404 529-7208

March 25, 1992

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

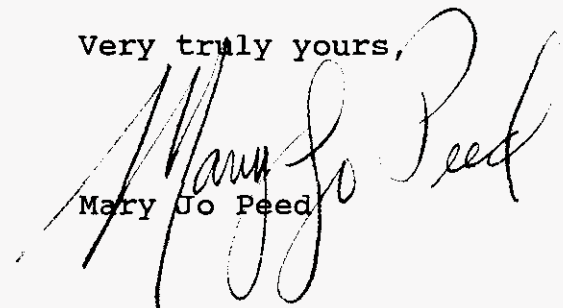
Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Response and Objections to Public Counsel's 21st Request for Production of Documents, 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 on the parties shown on the attached Certificate of Service.

- ACK
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- ENG \_\_\_\_\_
- ESG 1 w/m \_\_\_\_\_
- FIN 6 \_\_\_\_\_
- GFC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1 \_\_\_\_\_
- WAS \_\_\_\_\_
- WHI \_\_\_\_\_

Very truly yours,



Mary Jo Peed

Enclosure

- cc: H. R. Anthony
- A. M. Lombardo
- R. Douglas Lackey
- All Parties noted on Certificate of Service

SEARCHED & FILED  
INDEXED & SERIALIZED  
MAR 25 1992  
FBI - TALLAHASSEE

DOCUMENT NUMBER-DATE

02960 MAR 25 1992

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

I HEREBY CERTIFY that a copy of the foregoing has been  
furnished by United States Mail this \_\_\_\_\_ day of \_\_\_\_\_,  
1992, 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



Mary Jo Reed

THE BEFORE  
FLORIDA PUBLIC SERVICE COMMISSION

Re: Investigation into the )  
Integrity of Southern Bell's ) Docket No. 910163-TL  
Repair Service Activities and )  
Reports ) Date Filed: March 25, 1992  
\_\_\_\_\_ )

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
RESPONSES AND OBJECTIONS TO CITIZENS 21ST  
SET OF REQUEST FOR PRODUCTION OF DOCUMENTS  
AND MOTION FOR A TEMPORARY PROTECTIVE ORDER

COMES NOW, BellSouth Telecommunications, Inc. doing business as Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company") and files, (1) pursuant to Rule 25-22.034, Florida Administrative Code, and Rules 1.280(c) and 1.350 of the Florida Rules of Civil Procedure, its Response and Objections to the office of Public Counsel's ("Public Counsel") 21st Set of Requests for Production of Documents dated February 19, 1992, and (2) pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, its Motion for a Temporary Protective Order. To the extent that any individual request might otherwise be subject to a motion for protective order other than pursuant to Rule 25-22.006(5)(c), this response may be considered as serving that purpose. See, Slatnick v. Leadership Housing System of Florida, Inc., 368 Southern 2nd 78 (Fla. 4th DCA 1979).

GENERAL RESPONSE AND OBJECTIONS

1. Some of the documents that will be delivered to and reviewed by Public Counsel contain information which is exempted from disclosure pursuant to Section 119.07, Florida Statutes or constitutes confidential proprietary business information pursuant to Section 364.183(3), Florida Statutes. Specifically,

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for example, a number of the documents contain customer specific information which is exempted from the Open Records Act as a matter of law under Section 119.07(3)(w), Florida Statutes. Other documents contain Southern Bell employees' social security numbers which constitutes confidential proprietary business information pursuant to Section 364.183(3), Florida Statutes. Thus, pursuant to the Commission's rule on confidentiality, Rule 25-22.006(5)(c), Florida Administrative Code, Southern Bell moves the pre-hearing officer to issue a temporary protective order exempting these documents from Section 119.07(1), Florida Statutes. Once Public Counsel notifies Southern Bell that any of the proprietary documents are to be used in a proceeding before the Commission, Southern Bell will, in accordance with Rule 25-22.006, Florida Administrative Code, file a detailed motion for protective order specifically addressing each of the documents identified. The proprietary information in question is furnished in response to Request Nos. 3 and 10. Documents produced in response to Request No. 3 contain information which includes customer specific information and is therefore exempt from disclosure pursuant to Section 119.07(3)(w), Florida Statutes. Documents produced in response to Request No. 10 contain Southern Bell employees' social security numbers and therefore constitutes confidential proprietary business information pursuant to Section 364.183(3), Florida Statutes.

2. Southern Bell does not believe it was Public Counsel's intent to require Southern Bell to produce the same documents

previously or contemporaneously produced in this or other dockets, but to the extent it does, Southern Bell objects on the basis that such a request would be unduly burdensome, oppressive, and unnecessary, and for these reasons is prohibited.

#### SPECIFIC RESPONSES

3. Subject to the general objections, each of which is incorporated by reference into the specific responses made herein, Southern Bell responds to the individual numbered requests contained in Public Counsel's 21st Set of Requests for Production of Documents as follows:

A. In response to Request No. 1, Southern Bell will produce the document responsive to this request.

B. In response to Request No. 2, Southern Bell objects to the production of the September 19, 1991 MOOSA Audit. The Audit was done through and at the direction of counsel for Southern Bell and therefore constitutes attorney-client privileged material.

C. In response to Request No. 3, Southern Bell states that the MP-2312 report is utilized to verify billing and credits applied to Southern Bell customer accounts. Prior to November 1991, the MP-2312 report contained only two parts. Part one of the MP-2312 report lists a sample of services ordered by customers during a certain bill period and the corresponding service orders for those services. Part one of the report primarily selects the criteria for use in Part two. Part two of the MP-2312 report lists the service orders and corresponding

account numbers for the service criteria selected in Part one of the report. The Billing Verification Group in Comptrollers utilizes the MP-2312 report to verify from a sample of service orders that service order to customer account billing flow is functioning correctly. In November of 1991, Southern Bell added Part three to the MP-2312 report. Part three contains a sampling of accounts which were to receive a out-of-service credit from the mechanized system. The Billing Verification Group in Comptrollers utilizes this part of the MP-2312 report to verify the inclusion of the out-of-service credits on a representative sample of customers' accounts. Southern Bell will produce one complete MP-2312 report, including all parts and all Part three MP-2312 reports in its custody and control. The MP-2312 report has no retention period under Southern Bell document retention guidelines however the Florida department which exercises custody and control of these documents retains them for 60 days.

D. In response to Request No. 4, Southern Bell will produce the documents responsive to this request.

E. In response to Request No. 5, Southern Bell will produce the documents responsive to this request.

F. In response to Request No. 6, Southern Bell will produce the documents responsive to this request.

G. In response to Request No. 7, Southern Bell will produce all TREAT reports pertaining to Public Service Commission results from January 1987 through December, 1987, and from January 1991 through December 1991. Southern Bell has previously

produced January 1988 through March 1991 results in response to Citizens's 1st Request for Production of Documents, Item 11 and results for January 1980 through December 1990 in response to Citizen's 3rd Request for Production of Documents, Item 3.

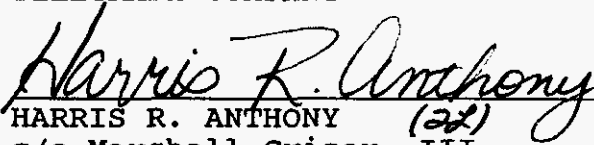
H. In response to Request No. 8, Southern Bell will produce the documents responsive to this request.

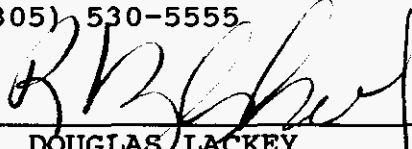
I. In response to Request No. 9, Southern Bell will produce the documents responsive to this request.

J. In response to Request No. 10, Southern Bell will produce the documents responsive to this request, subject to the protective order requested by this pleading.

Respectfully submitted this 25th day of March, 1992.

BELLSOUTH TELECOMMUNICATIONS, INC.  
d/b/a SOUTHERN BELL TELEPHONE AND  
TELEGRAPH COMPANY

  
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