

**ORIGINAL
FILE COPY**

J. Phillip Carver
General Attorney

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

June 5, 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 - Repair Service Investigation

Dear Mr. Tribble:


Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Response and Objections to Staff's Sixteenth Request for Production of Documents dated May 1, 1992, and its Notice of Intent to Seek Confidential Treatment, which we ask that you file in the captioned docket.

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG 1 _____
- LIN 4 Enclosures
- OPC _____
- RCH _____
- SEC 1 _____
- WAS _____
- OTH _____

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.

Sincerely yours,
J. Phillip Carver (cf)
J. Phillip Carver

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

RECEIVED & FILED

EPSC BUREAU OF RECORDS

A BELL SOUTH Company

DOCUMENT NUMBER-DATE
05859 JUN -5 1992
EPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 910163-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 5th day of June, 1992,
to:

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

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

J. Phillip Conner (sg)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition on behalf of Citizens) Docket No. 910163-TL
of the State of Florida to initiate)
investigation into integrity of) Filed: June 5, 1992
Southern Bell Telephone and Telegraph)
Company's repair service activities)
and reports.)
_____)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
RESPONSE AND OBJECTIONS TO STAFF'S SIXTEENTH
REQUEST FOR PRODUCTION OF DOCUMENTS AND
NOTICE OF INTENT TO SEEK CONFIDENTIAL TREATMENT

COMES NOW BellSouth Telecommunications, Inc., d/b/a 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, Florida Rules of Civil Procedure, its Response and Objections to the Florida Public Service Commission Staff's ("Staff") Sixteenth Request for Production of Documents dated May 1, 1992, and (2) pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, its Notice of Intent to Seek Confidential Treatment.

GENERAL RESPONSES AND OBJECTIONS

1. Southern Bell objects to Staff's definition of "document" or "documents". Staff's definition of these terms is overly broad and is objectionable pursuant to standards adopted in Caribbean Security Systems v. Security Control Systems, Inc., 486 So.2d 654 (Fla.App. 3rd Dist. 1986).

2. Some of the documents that will be delivered to and reviewed by Staff contain proprietary, confidential business information that should not be publicly disclosed. Thus,

DOCUMENT NUMBER-DATE

05859 JUN-5 1992

FPSC-RECORDS/REPORTING

pursuant to the Commission's Rule on confidentiality, Rule 25-22.006(3)(a), Florida Administrative Code, Southern Bell hereby gives Notice of its Intent to Seek Confidential Treatment of these documents and to seek exemption from § 119.07(1), Florida Statutes. The proprietary documents in question include, but are not limited to, employee information not related to the employee's compensation, duties, qualifications or responsibilities. These documents include the names of current and former employees who have been disciplined for matters addressed in Staff's Sixteenth Request for Production of Documents.

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 request contained in Staff's Sixteenth Request for Production of Documents as follows:

Southern Bell objects to this request to the extent it seeks documents covered by the attorney/client privilege or attorney work product privilege, or both. Such documents consist of notes compiled by the Personnel Department and derived from the privileged internal investigation in order to determine whether any individual should be disciplined and to what extent. In response to Request No. 1, Southern Bell will produce, at a mutually convenient time and place, certain of the responsive materials that it has in its possession, custody, or control,

which it has not previously furnished to the Staff in conjunction with previous requests.

Respectfully submitted,

ATTORNEYS FOR SOUTHERN BELL
TELEPHONE AND TELEGRAPH COMPANY

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