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June 26, 1992

Mr. Steve C. Tribble
Director, Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

Re: Staff's 15th Request for Production of Documents
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 Request for Confidential Classification and Motion for Permanent Protective Order, 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.

Sincerely yours,

J. Phillip Carver
J. Phillip Carver

Enclosures

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

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

Note: DN 6898-92 Forwarded to Cmu.
A BELLSOUTH Company

DOCUMENT NUMBER-DATE

06897 JUN 26 1992

FPSC-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 *26th* 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

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

Philip C. Cava

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 26, 1992
Southern Bell Telephone and Telegraph)
Company's repair service activities)
and reports.)
_____)

**SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION
AND MOTION FOR PERMANENT PROTECTIVE ORDER**

COMES NOW BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), pursuant to Rule 25-22.006, Florida Administrative Code, and files its Request for Confidential Classification and Motion for Permanent Protective Order regarding certain information provided to the Florida Public Service Commission ("Commission") Staff in response to its Fifteenth Request for Production of Documents in this docket.

1. On May 1, 1992, Staff served its Fifteenth Request for Production of Documents. On June 5, 1992, Southern Bell filed its response to this request, including a Notice of Intent to Request Confidential Classification. Consistent with the rules of the Commission, Southern Bell then provided to the Commission Staff the responsive documents, including the material for which specified confidential treatment is now requested.

DOCUMENT NUMBER-DATE
06897 JUN 26 1992
FPSC-RECORDS/REPORTING

2. In accord with Rule 25-22.006, Florida Administrative Code, Southern Bell now files its Request for Confidential Classification and Motion for Permanent Protective Order for certain information contained in the responses provided to the Staff's Fifteenth Request for Production of Documents. Southern Bell herein requests confidential classification of certain documents produced in response to Staff's Request No. 3 and No. 10. Specifically, documents responsive to Request No. 3 contain confidential customer information that is specifically preempted from Section 119.07, Florida Statutes. Documents responsive to Request No. 10 contain employees' social security numbers, which are confidential pursuant to Section 364.183(3), Florida Statutes.

3. Southern Bell has filed a highlighted version of the documents responsive to the Fifteenth Request in a sealed container, which is marked as Attachment "A." Southern Bell has also filed two redacted copies of these documents as Attachment "B." Finally, Southern Bell has filed as Attachment "C" a listing of specific pages and lines of the documents that contain proprietary confidential information, all of which are confidential for the reasons set forth below.

4. Under the express provisions of Florida Statutes § 119.07(3)(w), information maintained by Southern Bell that

"contain[s] the name, address and telephone number of subscribers" is exempt from the Open Records Act. The documents produced in response to Request No. 3 are reports used to verify the billing and credits applied to the accounts of Southern Bell customers. These records list specifically the telephone numbers of the particular customers whose service has been analyzed as part of the report. Accordingly, this is precisely the type of information that is expressly exempted from public disclosure by § 119.07(3)(w), Florida Statutes.

5. Request No. 10 calls for the production of certain information regarding employees of Southern Bell. Included in these documents are the social security numbers of these employees. This information is proprietary and confidential under the provisions of Section 364.183(f), Florida Statutes. This section provides that "proprietary confidential business information" includes "employee personnel information unrelated to compensation, duties, qualifications, or responsibilities." Accordingly, social security numbers of employees are exempt from the public disclosure otherwise required by the Open Records Act.

6. The social security number of an employee does not relate to that employee's compensation, duties, qualifications, or responsibilities. This is information, the public disclosure of which would serve no purpose whatsoever. At the same time,


the unnecessary disclosure of this information could obviously be improperly used by third parties in a variety of ways that could cause damage to those employees.


7. All of the information for which Southern Bell requests confidential treatment is intended to be treated as confidential, has been treated as confidential and has not been disclosed to any third party except pursuant to statutory provisions or private agreement that provides that the information will not be released to the public.

WHEREFORE, Southern Bell requests that the Commission grant its Request for Confidential Classification and Motion for Permanent Protective Order.

Respectfully submitted,

ATTORNEYS FOR SOUTHERN BELL
TELEPHONE AND TELEGRAPH COMPANY


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ATTACHMENT A

JUSTIFICATION FOR CONFIDENTIALITY REQUEST

FPSC DOCKET 910163 - TL

FPSC Staff's 15th Request for Documents

ITEM NO. 3

The information identified herein for which Southern Bell seeks confidential classification is information relating to customers that is exempted from public disclosure by the provisions of Section 119.07(3)(w), Florida Statutes.

The confidential information contained in these documents is all located under the columns headed: "Account Number" and "Line Number".

ATTACHMENT A

JUSTIFICATION FOR CONFIDENTIALITY REQUEST

The information identified herein for which Southern Bell seeks confidential classification is employee personal information unrelated to compensation, duties, qualifications or responsibilities, which is confidential pursuant to Section 364.183(f), Florida Statutes.

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FPSC STAFF'S 15th REQUEST FOR DOCUMENTS

ITEM NO. 10

The following information identified by page and line numbers is considered confidential:

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