

**ORIGINAL
FILE COPY**

J. Phillip Carver
General Attorney

Southern Bell Telephone
and Telegraph Company
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150 So. Monroe Street
Tallahassee, Florida 32301
Phone (305) 530-5558

August 7, 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 to Request of Public Counsel for Late-Filed Exhibits, 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 ACK Certificate of Service.

- AFA _____
- APP _____
- CAF _____
- CMU _____

CTR Enclosures

- EAG cc: All Parties of Record
- LEG / A. M. Lombardo
- LIN 6 Harris R. Anthony
- R. Douglas Lackey
- GPC _____

- RCH _____
- SEC / _____
- WAS _____
- OTH _____

RECEIVED & FILED
FPSC BUREAU OF RECORDS

Sincerely yours,
J. Phillip Carver
J. Phillip Carver
(22)

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: August 7, 1992
Southern Bell Telephone and Telegraph)
Company's repair service activities)
and reports.)
_____)

**SOUTHERN BELL TELEPHONE AND TELEGRAPH
COMPANY'S RESPONSE TO REQUEST OF PUBLIC
COUNSEL FOR LATE-FILED EXHIBITS**

COMES NOW BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), and hereby submits its Response to Request of Public Counsel for Late-Filed Exhibits and states the following:

1. During the panel deposition of C. L. Cuthbertson, Jr. and C. J. Sanders on June 17, 1992, Public Counsel requested the production of certain documents. The parties agreed to a procedure whereby these documents would be produced without the necessity of a formal request to produce. Specifically, there was an agreement that these would be produced at a subsequent date as "Late Filed Exhibits" to the deposition. Southern Bell hereby responds to that request for late filed exhibits.

2. In any instance in which Southern Bell has responded by stating that documents will be produced at a mutually agreeable time and place, the documents will be subsequently sent to Public Counsel under separate cover.

3. Request No. 1: Panel recommendations regarding craft discipline.

DOCUMENT NUMBER-DATE

08870 AUG -7 1992

FPSC-RECORDS/REPORTING

Response: Southern Bell objects because this request calls for the production of documents that are protected by the attorney-client privilege and work product doctrine. These documents contain information obtained from counsel for Southern Bell, which was developed in anticipation of litigation, and was the basis upon which legal opinions were rendered to Southern Bell by its attorneys.

4. Request No. 2: Panel recommendations regarding pay grade 5 and below discipline.

Response: Southern Bell objects because this request calls for the production of documents that are protected by the attorney-client privilege and work product doctrine. These documents contain information obtained from counsel for Southern Bell, which was developed in anticipation of litigation, and was the basis upon which legal opinions were rendered to Southern Bell by its attorneys.

5. Request No. 3: B-Form entries for "on your watch employees."

Response: The responsive documents in the possession of Southern Bell will be produced at a mutually agreeable time and place.

6. Request No. 4: All documents reflecting practices and procedures regarding the initiation and conducting of investigations and internal audits.

Response: The responsive documents in the possession of Southern Bell will be produced at a mutually agreeable time and place.

7. Request No. 5: The name, position and discipline imposed on any employee above Pay grade 8 within the context of the trouble reporting investigation.

Response: None.

8. Request No. 6: All documents regarding the initiation of Southern Bell's investigation into the trouble reporting issue.

Response: Southern Bell objects to the production of any documents responsive to this request that may be protected by the attorney-client and/or work product privilege. To the extent that any documents exist and are in the possession of Southern Bell that are not protected by the above-mentioned privileges, they will be produced at a mutually agreeable time and place. Southern Bell will supplement this response as soon as possible to state whether any document has, in fact, been withheld pursuant to a claim of privilege.

9. Request No. 7: All documents created by the disciplinary recommendation panel.

Response: Southern Bell objects to the production of any documents responsive to this request that may be protected by the attorney-client and/or work product privilege. To the extent that any documents exist and are in the possession of Southern Bell that are not protected by the above-mentioned privileges,

they will be produced at a mutually agreeable time and place. Southern Bell will supplement this response as soon as possible to state whether any document has, in fact, been withheld pursuant to a claim of privilege.

10. Request No. 8: Any documents related to discipline for sales-related issues that had not previously been provided to Public Counsel.

Response: The responsive documents in the possession of Southern Bell will be produced at a mutually agreeable time and place.

11. Request No. 9: Missing entry or entries related to deposition Exhibit No. 9.

Response: Southern Bell objects to the production of any documents responsive to this request that may be protected by the attorney-client and/or work product privilege. To the extent that any documents exist and are in the possession of Southern Bell that are not protected by the above-mentioned privileges, they will be produced at a mutually agreeable time and place. Southern Bell will supplement this response as soon as possible to state whether any document has, in fact, been withheld

pursuant to a claim of privilege.

Respectfully submitted,

ATTORNEYS FOR SOUTHERN BELL
TELEPHONE AND TELEGRAPH COMPANY



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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 *7th* day of *Aug.*, 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

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(22)