

a

ORIGINAL
FILE COPY

J. Phillip Carver
General Attorney

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

August 11, 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 Notice of Filing Executed Affidavit of Danny L. King, which we ask that you file in the captioned docket.

- ACK
- AFA _____
- APP _____
- CAF _____
- CFD
- CR _____
- ESD _____
- LEO 1 _____
- ML 6 _____
- _____
- _____
- _____
- _____
- _____

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 *oz*

Enclosures

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

RECEIVED & FILED

FLORIDA BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

A BELLSOUTH Company 09008 AUG 11 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 11th day of August, 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

J. Phillip Carver PJ

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 11, 1992
Southern Bell Telephone and Telegraph)
Company's repair service activities)
and reports.)
_____)

**SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
NOTICE OF FILING EXECUTED AFFIDAVIT OF DANNY L. KING**

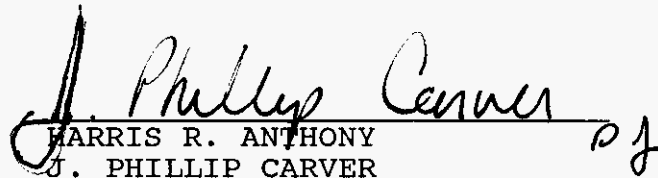
COMES NOW BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), and hereby gives Notice of the Filing of the Executed Affidavit of Danny L. King in support of Southern Bell's Opposition to Public Counsel's Seventh Motion to Compel and states the following:

1. On August 4, 1992, Southern Bell filed its Opposition to Public Counsel's Seventh Motion to Compel and Request for In Camera Inspection of Documents. Attached to that Memorandum in Opposition was an unexecuted affidavit of Danny L. King. Southern Bell stated in the memorandum that an executed Affidavit of Mr. King would be subsequently filed.

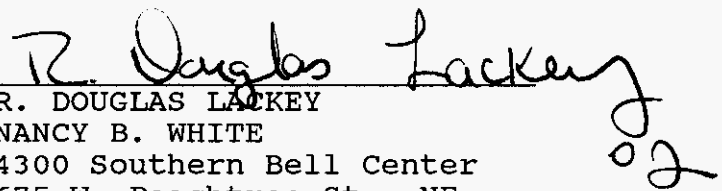
2. Southern Bell hereby gives notice of filing the executed Affidavit of Mr. King, which is attached. This executed Affidavit is in the same form as the unexecuted affidavit that was filed on August 4 as an exhibit to the above-referenced Memorandum.

Respectfully submitted,

ATTORNEYS FOR SOUTHERN BELL
TELEPHONE AND TELEGRAPH COMPANY



HARRIS R. ANTHONY
J. PHILLIP CARVER
c/o Marshall M. Criser III
150 So. Monroe Street
Suite 400
Tallahassee, Florida 32301
(305) 530-5555



R. DOUGLAS LACKEY
NANCY B. WHITE
4300 Southern Bell Center
675 W. Peachtree St., NE
Atlanta, Georgia 30375
(404) 529-3862

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

STATE OF ALABAMA)
)
COUNTY OF JEFFERSON)
_____)

AFFIDAVIT OF DANNY L. KING

BEFORE ME, the undersigned authority, personally appeared
Danny L. King who stated that he is currently the Assistant Vice
President, Central Office Operations Support for BellSouth
Telecommunications, Inc., and further states the following:

1.

In May of 1991, he was requested to assist the Florida Legal
Department in performing an internal investigation that relates
to certain of the issues raised in this Docket. His role in the
investigation was to assist the Legal Department in gathering and
analyzing information necessary to render legal advice to the Company.

2.

Specifically, he was requested by the Legal
Department to perform a statistical analysis of the manner in
which trouble reports were handled at various locations
throughout Florida. This process was initiated at the express
request of the Legal Department and would not have been performed
without the request of the Department.

DOCUMENT NUMBER-DATE
09008 AUG 11 1992
FSC-RECORDS/REPORTING

3.

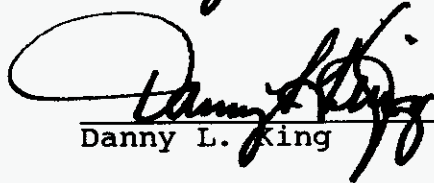
He was provided with specific information that was obtained by lawyers in the Florida Legal Department as part of the ongoing investigation. He then utilized a database that contained trouble histories for various years to analyze the information provided by the Legal Department. The purpose of the analysis was to determine the veracity of the information obtained in the investigation and to quantify any significant deviation. He continued the above-described efforts until the early part of 1992.

4.

During this time frame, he provided a number of reports to the Legal Department that set forth the results of the analysis. A very small number of copies of these reports exist. All have been marked and treated as privileged and attorney work product doctrine. The distribution of these reports was limited to appropriate members of the Legal Department and to certain member of the Management of Southern Bell who had a need to know the information contained therein.

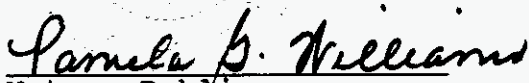
FURTHER AFFIANT SAYETH NOT.

Dated this 5th day of August, 1992.



Danny L. King

Sworn to and subscribed
before me this 5th
day of August.
1992.



Notary Public

My Commission Expires:
Notary Public, Alabama State at Large
My Commission Expires February 16, 1995
Bonded by Hartford Fire Insurance Company