

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 19, 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 Supplement to Response and Objections to Staff's Sixteenth Request for Production of Documents and Notice of Intent to Seek Confidential Treatment, 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 *pg*
J. Phillip Carver

Enclosures

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

DOCUMENT NUMBER-DATE

A BELLSOUTH Company 09375 AUG 19 1992

F-PSC-RECORDS/REPORT

CERTIFICATE OF SERVICE
Docket No. 910163-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 19 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 *js*

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 19, 1992
Southern Bell Telephone and Telegraph)
Company's repair service activities)
and reports.)
_____)

**SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
SUPPLEMENT TO 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 Supplement to 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.

1. On May 1, 1992, Staff propounded to Southern Bell its Sixteenth Request for Production of Documents. Southern Bell timely responded to this Request on June 5, 1992.

2. Southern Bell has subsequently discovered that it has in its possession an additional document that is responsive to the single numbered request (including sub-parts) of the Sixteenth Request to Produce. Accordingly, Southern Bell hereby responds by producing a copy of this document to Staff.

DOCUMENT NUMBER-DATE
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3. As with the original documents produced, the additional document being produced at this time contains proprietary, confidential business information that should not be publicly disclosed. Thus, 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 this document and to seek exemption from § 119.07(1), Florida Statutes. The proprietary information in question includes, but is not limited to, employee information not related to the employee's compensation, duties, qualifications or responsibilities. This document includes the name of an employee who has been disciplined for matters addressed in Staff's Sixteenth Request for Production of Documents.

Respectfully submitted,

ATTORNEYS FOR SOUTHERN BELL
TELEPHONE AND TELEGRAPH COMPANY

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

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