

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into)
the integrity of SOUTHERN)
BELL TELEPHONE AND TELEGRAPH)
COMPANY'S repair service)
activities and reports.)
_____)

DOCKET NO. 910163-TL

In re: Investigation into)
the integrity of SOUTHERN)
BELL TELEPHONE AND TELEGRAPH)
COMPANY'S compliance with)
Rule 25-4.110(2), F.A.C.,)
Rebates.)
_____)

DOCKET NO. 910727-TL
(CONSOLIDATED)
FILED: 12/18/92

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and copies of STAFF'S TWENTY-SIXTH REQUEST FOR PRODUCTION TO SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY has been served by U.S. Mail, this 18th day of December, 1992, to the following:

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Southern Bell Telephone and
Telegraph Company
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Tallahassee, FL 32301

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3300 Barnett Center
50 North Laura Street
P. O. Box 4099
Jacksonville, FL 32201

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

Tracy [Signature]

JEAN R. WILSON
Staff Counsel

Florida Public Service Commission
101 E. Gaines Street
Tallahassee, FL 32399-0863
(904) 487-2740

DOCUMENT NUMBER-DATE
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FPSC-RECORDS/REPORTING

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STAFF'S TWENTY-SIXTH REQUEST FOR PRODUCTION TO
SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

Pursuant to Rule 25-22.034, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, Staff hereby requests that the following described documents be produced for inspection and copying at the Florida Public Service Commission, 101 East Gaines Street, Room 226, Fletcher Building, Tallahassee, Florida, or at some other mutually convenient location.

DEFINITIONS AND INSTRUCTIONS

As used herein, unless the context indicates otherwise, the following words and phrases are defined as follows:

1. "You", "your", "Company" or "Southern Bell" refers to BELLSOUTH TELECOMMUNICATIONS, INC., d/b/a SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY and its directors, officers, employees, agents, attorneys, staff, assigns, predecessors, successors, representatives, subsidiaries, parents, branches, departments, affiliates and divisions.

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2. "Document" or documents" refers to all written or graphic matter, drafts, originals and non-conforming copies which contain deletions, insertions, handwritten notes or comments, however produced or reproduced, or to any other tangible permanent record without limitation, and shall include, among other things, all letters, accounts, statements of account, correspondence, records of conferences, memoranda, notes, telegrams, summaries, telephone logs and records, teletypes, bank checks, bank deposits and withdrawal slips, bank credit and debit memoranda, bank drafts, bank statements, telexes, private wire messages, communications, desk calendars, diaries, appointment books, agendas, meetings, conversations, schedules, reports, studies, appraisals, analyses, lists, surveys, budgets, financial statements, financial projections, financial calculations, contracts, agreements or proposed agreements, notice of wire transfer of funds or other notices, canceled checks, periodicals, charts, graphs, interviews, speeches, transcripts, depositions, press releases, brochures, books of accounts, affidavits, communications with government bodies, invoices, notices and minutes of meetings of boards of directors, audit committees, financial committees and executive committees, interoffice communications, results of investigations, working papers, newspaper or magazine articles, records of payments, releases, receipts, computer data, maps, liftings, tax

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returns, vouchers, papers similar to any of the foregoing and other writings of every kind and description (whether or not actually used) and other records of voice recordings, film, tapes, and other data compilations from which information can be obtained. Any copy containing thereon or having attached thereto any alterations, notes, comments, or other material not included in the original or copies referred to in the preceding definition shall be deemed a separate document within said definition.

3. A document or communication "relating to" a given subject means any document or communication that constitutes, contains, embodies, comprises, reflects, identifies, states, refers to, deals with, comments on, responds to, describes, analyzes or is in any way pertinent to that subject, including, without limitation, documents concerning the presentation of other documents.

4. If any documents otherwise required to be produced by this request are withheld, plaintiff shall identify the documents by stating their date, author, recipients, type of documents, length of document, and the reason for withholding.

5. This request for production of documents requests production of documents in your possession, or subject to your custody or control.

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6. This request for production of documents is continuing and any document obtained or located subsequent to production which would have been produced had it been available or its existence known at the time is to be supplied forthwith.

**SUBJECT TO THE FOREGOING, STAFF REQUESTS THAT YOU PRODUCE THE
FOLLOWING DOCUMENTS FOR INSPECTION.**

1. Please provide the personnel documents, e.g., B form entries, annual evaluations, grievance proceedings, and security investigations, if any, for Mr. Eddy Herrera from 1985 to present.
2. Please provide the March, April, May 1991 Customer Trouble Report Summary Combined District Report OTC INTEGRIS Report, Form E2700C, based on all fourteen Installation Maintenance Centers.
3. Please provide the May 31, 1991, MTAS Daily Recirculation file used in the KSRI audit.
4. Please provide the monthly percentages that represent the State of Florida total number of OOS trouble reports with the DISP codes 12xx and 13xx that exceeded 24 hours to clear time

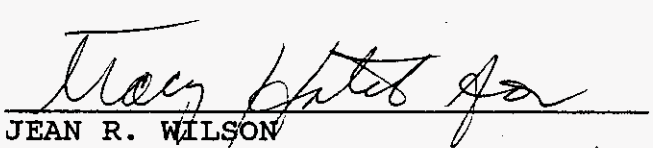
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divided by the total monthly OOS trouble reports that exceeded 24 hours duration for the period starting in January 1985 and monthly thereafter to the most recent available.

- a. Please provide the actual numerators and denominators for the percentages also.
5. Please provide the cover page and pages from the internal standardization reviews that address the DISP 1200 & 1300 usage from all IMCs for 1985 to the most recent review.
 6. Please provide the PSC Schedule 11 report for June through September 1987 and April 1992 through August 1992.
 7. Please provide the E2700 report for January 1987 through December 1988 and June 1991 through August 1992.
 8. Please provide any documents that are responsive to Citizens' 32nd Interrogatory, specifically:
 - a. Item no. 1;
 - b. Item no. 2;
 - c. Item no. 3;
 - d. Item no. 4; and
 - e. Item no. 5.

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- f. Item no. 6.
9. Please provide the February 24, 1984 letter referred to on p. 15 of Standardization Procedures Maintenance Center, Sandlake District, November 1985.
10. Please provide 660-169-908SV.
11. Please provide a chronological listing of changes to MTAS Report 30, "Candidates for Quality Investigation" since its origin and any documents pertaining to the necessity for the changes.
12. Please provide any reports that explain what measures have been taken to correct or explain the "Candidates for Quality Investigation" that appear on MTAS Report 30 since 1985.



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