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February 17, 1993

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

Re: Docket No. 920260-TL - 900960-TL - 910163-TL - 910727-TL

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Request for Confidential Classification, 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
(st)

Enclosures

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

CERTIFICATE OF SERVICE

Docket No. 920260-TL
Docket No. 900960-TL
Docket No. 910163-TL
Docket No. 910727-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this *17th* day of *Feb.*, 1993

to:

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of) Docket No. 920260-TL
the Revenue Requirements and Rate)
Stabilization Plan of Southern)
Bell Telephone & Telegraph Company)

In re: Investigation into Southern) Docket No. 900960-TL
Bell Telephone and Telegraph)
Company's Non-Contact Sales)
Practices)

In re: Petition on behalf of) Docket No. 910163-TL
Citizens of the State of Florida)
to initiate investigation into)
integrity of Southern Bell)
Telephone and Telegraph Company's)
repair service activities and)
reports.)

In re: Investigation into) Docket No. 910727-TL
Southern Bell Telephone and)
Telegraph Company's Compliance) Filed: Feb. 17, 1993
with Rule 25-4.110(2) (Rebates))

**SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

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 of certain information provided to the Florida Public Service Commission ("Commission") Staff in response to Audit Requests made pursuant to Audits that were conducted in connection with the above-referenced dockets.

1. Pursuant to the above captioned dockets, the Staff of the Florida Public Service Commission ("Commission") undertook two related audits: one was designated the "Audit of Southern

Bell Repair Process Controls"; the other was designated "Audit of Southern Bell Non-Contact Sales."

2. During the course of those audits, Southern Bell produced to the Commission Staff certain documents that have been retained among the Audit workpapers. These include copies of reports of Southern Bell audits that were prepared by internal auditors employed by Southern Bell. Also, the Staff's Draft Audit Reports for each of the above-described Audits make substantive references to portions of Southern Bell's internal audits.

3. The audit exit conference between Southern Bell and the Commission Staff for the above-referenced Audits has been conducted. Accordingly, Southern Bell filed its Notice of Intent to Seek Confidential Classification immediately after the conference, on January 27, 1993. Under the provisions of Rule 25-22.006(3)(a), Florida Administrative Code, Southern Bell has twenty-one days, i.e., until February 17, 1993, to request confidential classification for the confidential material in question.

4. In accord with Rule 25-22.006, Florida Administrative Code, Southern Bell now files this request for confidential classification of certain information. Specifically, Southern Bell seeks confidential classification for information that has been taken from Southern Bell's audits that were conducted by its own internal auditors. This information was provided to Staff in response to requests that were made pursuant to the above-

referenced audits. Some of the information is in the form of documents provided by Southern Bell (i.e., copies of Southern Bell's internal Audits that are to be retained in the workpapers). Other confidential information was taken by Staff auditors directly from Southern Bell's internal audits and referenced in the Staff's Draft Audit Reports for each of the above-referenced Audits. Under Section 364.183(3)(b), Florida Statutes, "internal auditing controls and reports of internal auditors" are specifically exempted from the public disclosure requirements of Section 119.07(1). Thus, under the express provisions of Section 364.183 this material is entitled to the confidential treatment sought herein.

5. Southern Bell has filed as Attachment "A" a listing of specific pages and lines of the documents produced that contain proprietary confidential information along with a specific justification for the respective requests for confidentiality. Southern Bell has also filed two redacted copies of these documents as Attachment "B." Finally, Southern Bell has filed a highlighted version of the confidential documents in a sealed container, which is marked as Attachment "C."

6. All of the information identified above for which Southern Bell seeks confidential classification has been treated confidentiality by Southern Bell in that it has not been disclosed to any third party except to the extent that it may have been disclosed "pursuant to a statutory provision, an order of a court of administrative body, or private agreement that

provides that the information will not be released to the public." Florida Statutes, Section 364.183(3).

WHEREFORE, Southern Bell requests that the Commission grant its Request for Confidential Classification.

Respectfully submitted,

SOUTHERN BELL TELEPHONE AND
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ATTACHMENT "A"

**INDEX OF PROPRIETARY INFORMATION FOR
NON-CONTACT SALES INCENTIVE PROGRAM AUDIT REPORT**

The following information is considered by Southern Bell to be proprietary in that it was derived from or refers to internal auditing controls and reports of internal auditors, and is therefore confidential pursuant to Section 364.183(3)(b) of Florida Statutes.

<u>PAGE</u>	<u>LINE(S)</u>
37	13-19
38	7-11
39	4-19
40	1-9
67	10-13

ATTACHMENT "A"

**INDEX OF PROPRIETARY INFORMATION FOR
REPAIR PROCESS AUDIT REPORT**

The following information is considered by Southern Bell to be proprietary in that it was derived from or refers to internal auditing controls and reports of internal auditors, and is therefore confidential pursuant to Section 364.183(3)(b) of Florida Statutes.

<u>PAGE</u>	<u>LINE(S)</u>
23	5-9
36	5-9
53	15-18
54	1-12

ATTACHMENT "A"

INDEX OF PROPRIETARY INFORMATION

RETAINED IN STAFF AUDIT WORKPAPERS

The following information is considered by Southern Bell to be proprietary in that it is comprised of reports of Southern Bell's internal auditors, and is therefore confidential pursuant to Section 364.183(3)(b) of Florida Statutes.

<u>AUDIT REPORT</u>	<u>PAGE</u>	<u>LINE(S)</u>
1 - Network Customer Trouble Report FA037-503-03-A-SF December 1988	All	All
2 - Repair Service Bureau Operations IA014-302-13-A-SF June 1988	All	All
3 - Repair Service Bureau Operations F-302-13-TS Network July 1986	All	All
4 - Special Services Maintenance Measurement Plan F-503-16-RSF-9-86 December 1987	All	All
5 - Special Services Maintenance Measurement Plan F-503-16-TSAF Network September 1986	All	All