



JACK SHREVE
PUBLIC COUNSEL

STATE OF FLORIDA
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, Florida 32399-1400
904-488-9330

March 29, 1993

Steve Tribble, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL. 32399-0850

Re: Docket No. 920260-TL

Dear Mr. Tribble:

Enclosed for filing in the above-referenced docket on behalf of the Citizens of the State of Florida are the original and 15 copies of the Citizens' Responses to Southern Bell Telephone & Telegraph Company's Motion for Confidential Treatment and Permanent Protective Order.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Sincerely,

Janis Sue Richardson
Janis Sue Richardson
Associate Public Counsel

ACK _____
AFA 1
APP _____
CAF 1
CMU 1 Enclosure
CTR _____
EAG _____
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OPC _____
RCH 1
SEC 1
WAS _____
OTH Kay

DOCUMENT NUMBER DATE
03437 MAR 29 83
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the)
Integrity of Southern Bell's) Docket No. 910163-TL
Repair Service Activities and)
Reports)

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

Show Cause Proceeding Against)
Southern Bell Telephone and) Docket No. 900960-TL
Telegraph Company for Misbilling)
Customers)

Investigation into Southern Bell)
Telephone and Telegraph) Docket No. 910727-TL
Company's Compliance with Rule)
25-4.110(2), F.A.C.)

March 29, 1993

**CITIZENS' RESPONSE TO SOUTHERN BELL TELEPHONE AND TELEGRAPH
COMPANY'S MOTION FOR CONFIDENTIAL TREATMENT
AND PERMANENT PROTECTIVE ORDER**

The Citizens of Florida ("Citizens"), by and through Jack Shreve, Public Counsel, file this response to the request for confidential classification and motion for permanent protective order filed by Southern Bell Telephone and Telegraph Company ("Southern Bell") on March 1, 1993.¹

¹ The company agreed to Public Counsel filing this response after the deadline. Public Counsel brought the circumstances enumerated herein to company counsel's attention on March 8, 1993. At that time, company counsel agreed to a delay in filing while he checked on the circumstances related herein. No further response having been received from the company, Public Counsel is filing its response this date.

1. Southern Bell seeks confidential treatment for a document labeled "AT&T Bell Laboratories", which describes the operation of a portion of the company's customer repair computer software. This document was first introduced as exhibit 56 at a panel deposition of Southern Bell experts on June 18, 1992. [Attachment A: excerpts of panel deposition, pp. 138, 152-155]

2. Public Counsel notified Mr. Harris R. Anthony, attorney for the company, that Public Counsel intended to introduce this document during the 1992 panel deposition. [Attachment B: Letter from J.S. Richardson to H.R. Anthony, Item 42, dated May 5, 1992] Public Counsel, as requested by the company, gave advanced notice of documents intended for use so that the company could file a motion for permanent protective order. It did not do so.

3. Indeed, Mr. Anthony at the beginning of the panel deposition on May 21, 1992, stated that he had looked through the documents and "didn't see anything beyond what was redacted that required confidential treatment." [Attachment C: Southern Bell Panel Deposition, May 21, 1992, pp. 5-6] Mr. Anthony did not raise any claim of privilege when the document was introduced as exhibit 56. [Att. A: pp. 152-155] The company did not file a motion for permanent protective order for this document when it requested that exhibit 53 presented during this panel deposition be held confidential. Southern Bell Tel. & Tel. Co.'s Motion for Confidential Treatment and Permanent Protective Order, Docket No. 910163-TL (Sept. 4, 1992).

4. Public Counsel reintroduced the AT&T Bell labs document as exhibit 9 during a panel deposition of Ms. Etta Martin and Mr. Danny L. King in Birmingham, Alabama on January 12, 1993. It was after this deposition that the company filed its request for permanent protective order.

5. The document has been received by the Commission in the transaction of a formally noticed Commission deposition. See Fla. Stat. § 119.011. As such it is now public record. Mr. Anthony confirmed this during the summer 1992 panel deposition. Failure to include this document in the request for confidential treatment of that panel's exhibits confirmed the company's position that the AT&T Bell labs document was not proprietary. Any claim of confidentiality by the company has been waived, orally and by failure to file a timely written request. Fla. Admin. Code R. 25-22.006. The company must prove that it has treated the AT&T Bell labs document as confidential material. Id. at 25-22.006(4)(d-e). It has failed to do so.

WHEREFORE, Citizens request this Commission to deny Southern Bell Telephone and Telegraph Company's motion for confidentiality for the AT&T Bell Laboratories document, exhibit 9.

Respectfully submitted,

JACK SHREVE
Public Counsel



CHARLES J. BECK
Deputy Public Counsel
JANIS SUE RICHARDSON
Associate Public Counsel

Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, Florida 32399-1400

(904) 488-9330

Attorneys for the Citizens
of the State of Florida

ATTACHMENT A: JUNE 18, 1992 PANEL DEPOSITION EXCERPTS

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 & TELEGRAPH COMPANY'S)
repair service activities and reports) Volume III
) Pages 136 - 254

DEPOSITION OF:

SOUTHERN BELL TELEPHONE AND
TELEGRAPH COMPANY

PANEL MEMBERS:

GARY HALL
RUDOLPH CHRISTIAN
APRIL IVY
GERARD PELLEGRINI
PHILLIP H. PETERSON**RECEIVED**

Division of Records & Reporting

JUL 8 1992

Florida Public Service Commission

FPSC Hearing Room 122
Fletcher Building
101 East Gaines Street
Tallahassee, FloridaMet pursuant to notice at 9:30 a.m.
Thursday, June 18, 1992

REPORTED BY:

LISA GIROD JONES, RPR, CM

W. PAUL RAYBORN & ASSOCIATES
P. O. BOX 10195
TALLAHASSEE, FLORIDA 32302-2195
(904) 224-7642

	EXHIBITS	
		<u>FOR I.D.</u>
1		
2		
3	54 - Initial Training For Installation/ Maintenance Center Personnel MC101 Trainee Handbook, Issue 2 - September 1990.	142
4		
5	55 - BellSouth Practice 660-169-012BT, Customer Service Quality Indicators January, 1992	149
6		
7	56 - AT&T Bell Laboratories, Inc., PA-2PO60- 01-LMOSJOB2, December 1986	152
8	57 - MTAS Report 00, September 6th, 1990	155
9	58 - Excerpt from BellSouth Practice 660-156- 031SV, MTAS Manual	156
10		
11	59 - (Late-filed) CON MTAS flag, impact on out of service over 24 hour reports in relation to Schedule 11	178
12		
13	60 - Section B, Part 3 Excluded Reports Issued by Maintenance Center	184
14	61 - DLETH, August 12th, 1990, 11:15 a.m.	184
15	62 - DLETH, August 18, 1990, 8:18 p.m.	184
16	63 - DLETH, August 24, 1990 at 2:57 p.m.	184
17	64 - (Late-filed) Evidence of rebate re Exhibit 61	201
18	65 - Memo from D. T. Houston, July 28, 1989	201
19	66 - 20th Interrogatory, Item No. 7, DLETH report dated June 25th, 1990, 10:28 a.m.	208
20		
21	67 - Item No. 2 and 3, PC 17th POD LMOS Loop Maintenance Operation System	213
22	68 - (Late-filed) Legible copy of Ex. 67 graphs; Definition of DEFT	216
23		
24	69 - DLETH, August 21, 1991, 6:44 p.m.	223
25	70 - Citizens' 19th Interrogatory, Item No. 4	231
	71 - Items No. 4, 6, Section 735-100-090SB	231

1 it a future date requested -- the instance of the customer,
2 the maintenance center personnel would issue this CON
3 transaction, which would not allow what's called a carryover
4 flag to be raised. And your conditions being you have an
5 out of service that is carried over that's over 24 hours.

6 And the sole purpose of -- my understanding of it,
7 which is just passed down through history, if you will, was
8 that we would not penalize ourselves when we're standing
9 ready to restore your service by 5 p.m. today but you don't
10 want us there. That's the way I understand it, or
11 understood it anyway.

12 MS. RICHARDSON: I have another exhibit, please.
13 This is titled AT&T Bell Laboratories, Incorporated, and has
14 a number at the top, PA-2PO60-01-LMOSJOB2, and the date is
15 December 1986. And the exhibit number?

16 MS. WILSON: Exhibit No. 56.

17 (Exhibit No. 56 marked for identification.)

18 MS. RICHARDSON: Mr. Pellegrini, are you familiar
19 with this document?

20 WITNESS PELLEGRINI: No, ma'am, I am not.

21 MS. RICHARDSON: Mr. Hall, are you familiar with
22 this document?

23 WITNESS HALL: I've seen it.

24 MS. RICHARDSON: Have you worked with this document
25 in the past? How familiar are you?

1 WITNESS HALL: I've worked from it.

2 MS. RICHARDSON: You've worked from it, okay.

3 WITNESS HALL: Prior to -- I believe as far back as
4 1976 these were the kind of documents that AT&T provided on
5 the jobs.

6 MS. RICHARDSON: Mr. Hall, does the CON, carried
7 over no code, affect whether a customer receives a rebate?

8 WITNESS HALL: No, ma'am, it does not.

9 MS. RICHARDSON: Does the CON flag set by LMOSJOB2
10 recompute the received clear time?

11 WITNESS HALL: No, ma'am.

12 MS. RICHARDSON: Let's look at Pages 14 and 28.
13 And I'd ask you to clarify some things for me there between
14 these two pages. On 14, Page 14, looking at the bottom of
15 the page where it has 4.37, CAROV, carried over, this is the
16 particular place in LMOSJOB2, where LMOSJOB2 identifies a
17 flag for carried over no, is that correct?

18 WITNESS HALL: Just a flag for carried over.
19 Carried over no is an intermediate status code. This goes
20 back historically. A lot of the Bell operating companies
21 used to have a measurement for out of service cleared the
22 same day. So whether it was carried over to the next day
23 was an important measurement. So if you received it at 8:00
24 at night, or something, and cleared by midnight, it was
25 still -- it carried over four hours. In our later

1 measurements, most everybody has gone to using within 24
2 hours to make it an equitable measurement. So it's kind of
3 an historical thing. And that carried over no did not set
4 this flag and it didn't set it because the customer calls us
5 to extend the appointment. So we have no chance of clearing
6 it within 24 hours, or excuse me, within the same day.

7 MS. RICHARDSON: Okay. I think I followed that,
8 but let me ask a question and see if I did.

9 WITNESS HALL: Okay.

10 MS. RICHARDSON: When the CON intermediate status
11 then shows up on a DLETH, would that set this particular
12 flag that is noted on Page 14 in LMOSJOB2?

13 WITNESS HALL: I believe it probably wouldn't, but
14 we don't use LMOSJOB2 --

15 MS. RICHARDSON: Prior to -- I mean prior to
16 inputting the -- going to MTAS, prior to that change.

17 WITNESS HALL: Even then, though, we haven't used
18 JOB2 for our measurements, so it's kind of a side issue.
19 We've never really been back to check. Some of these AT&T
20 products we no longer use. I would say it probably does,
21 but I don't know for sure.

22 MS. RICHARDSON: Okay, looking on Page 28 under
23 5.01 Content, about midway down you see the CAROV Offset
24 186, recomputed. What is recomputed?

25 WITNESS HALL: Well that's in a subsequent record,

1 subsequent report, which isn't really taken for anything
2 anyway. There's some companies that utilize subsequent
3 record as a measurement. We don't. I imagine that does --
4 on a subsequent report, the way it used to work was most of
5 the stuff was carried forward from the original report. A
6 subsequent report is received at a point in time after the
7 original, so it would have to calculate whether it was
8 carried over from the time of that second report. You
9 couldn't take the time off the first report because it would
10 only apply to the first. So if you use the subsequent, you
11 would have to calculate where the second report was actually
12 carried over is the way I would interpret that to mean. But
13 in our case it's irrelevant since we don't count subsequents
14 anyway. We don't do anything with that.

15 MS. RICHARDSON: So it doesn't apply in Florida is
16 what you're saying?

17 WITNESS HALL: Doesn't apply anywhere in
18 BellSouth.

19 MS. RICHARDSON: I have two items being passed
20 out. The first one -- we'll just give them different
21 exhibit numbers just so we can keep them straight. The
22 first one is titled MTAS Report 00 and it carries a run date
23 of September 6th, 1990, and that number would be?

24 MS. WILSON: That would be Exhibit No. 57.

25 (Exhibit No. 57 marked for identification.)

ATTACHMENT B: MAY 5, 1992 LETTER



STATE OF FLORIDA
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, Florida 32399-1400
904-488-9330

JACK SHREVE
PUBLIC COUNSEL

May 5, 1992

Mr. Harris R. Anthony
c/o Marshall M. Criser, III
BellSouth Telecommunications, Inc.
d/b/a/ Southern Bell Telephone
& Telegraph Company
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301

Re: May 1992 Panel Deposition on Docket No. 910163

Dear Hank:


In preparation for the upcoming panel deposition to be held at the Public Service Commission, I have prepared questions on Southern Bell's operating procedures based upon documents and responses received from Southern Bell. In accordance with your request, I am notifying you of the documents that I may wish to introduce as exhibits at the deposition. Should you wish to file for a protective order, please do so prior to the deposition so that all parties will know in advance which documents you consider confidential.

I have attached a listing of all the documents. With the exception of designated Bell practices and procedures and a few other documents that are easily identifiable, I have enclosed complete copies of the documents that I have pulled for possible use in the deposition. Among these are a number of DLETHs and customer billing records. For the DLETHs and billing record pages, I have provided an additional redacted copy that should pass the confidentiality requirements of the Public Records Law. Please review these to ensure to your satisfaction that they can be released without compromising any customer's confidentiality. If you then have an objection to their production in redacted form, please file a written request for confidentiality with the PSC prior to the deposition date.

Citizens' 21st Production of Documents request, Item No. 5, dated February 19, 1992, requested production of all RF0838-IS forms/reports generated since 1987 to the present. In its March 25, 1992 response, Southern Bell indicated that they would produce all of these. Citizens received the 1990 forms for Jacksonville, Miami and Ft. Lauderdale and the January 1, 1991 to September 1991 forms for Miami and Ft. Lauderdale. Please produce the rest of the forms for all areas for 1987, 1988, 1989, 1992 to present, the other areas for 1990, and Jacksonville and the other areas for 1991. This includes the RAO end of year summary sheets produced with RF0838-IS for 1991 and 1992 to date.

Should you have any questions or concerns regarding these matters, please call me.

Yours truly,


Janis Sue Richardson
Associate Public Counsel

Enc.: List of documents
Document copies (Southern Bell only)

cc: Tracy Hatch, FPSC
(Document copies not included)

LIST OF DOCUMENTS

Document Copies Attached

1. Excerpts from 1990 Dade Operational Review:
 - Section B: Excluded Reports; Recommendations
 - Section B: Excluded Reports; Reviewers Hints
 - Section B: Excluded Reports; Part 1: Rec to Clear < 24 hrs.
 - Section B: Excluded Reports; Part 3 score sheet, recommendations, and auditor's scoring sheet
 - Section B: Excluded Reports; Part 3 score sheet
 - Section E: OOS Statusing; Reviewers Hints
 - Section E: Part 1, score sheet and auditor's scoring sheet
 - Section E: Part 2, OOS Statusing > 24 hrs. score sheet, auditor's scoring sheet
2. Excerpts from Installation Maintenance Center Personnel MC101, Trainee Workbook, Issue 1, July 1988, include:
 - The telephone circuit, pp. M2-L1-5 to 13
3. Excerpts from IMC Training Manual, 1990 include:
 - CEST MASK, p. 7
 - RCMD HELP, p. 50
 - MMA DISP MASK
 - EST, p.36
 - FST, p. 37
4. Flow-Thru Performance Aid, MMA Management, A922, p. 16
5. Excerpts from Repair Service Attendant Initial Training RS104, Trainee Workbook - Module 3, Issue 2 - August 1990, Docket No. 910515-TL, include:
 - Physical Type Troubles, p.M3-L6-3
 - Module 3, Lesson 3, HANDLE FIELD, pp. M3-L3-1 to 10
6. IMC Supervisor's Manual, Docket No. 910505-TL, Pending Trouble Status Code Definitions, 5/15/89
7. DLETHs:
 - 305/8282111 Sept. 1990
 - 305/8256561 Aug. 1990
 - 305/8217205 July 1990
 - 305/3626697 July 1990
 - 305/6235638 Aug. 1990
 - 305/6815643 Aug. 1990
 - 305/6817841 Aug. 1990
 - 305/5940038 Aug. 1990
 - 305/6258625 Aug. 1990
 - 305/6873420 Aug. 1990
 - 305/6249546 Sept. 1990

305/4777302 Aug. 1990
305/3520902 Aug. 1990
305/5562410 Aug. 1990
305/5582927 Aug. 1990
305/5567899 Aug. 1990
305/6201198 Aug. 1990
305/6246824 Aug. 1990
305/6280715 Aug. 1990
305/8225061 Aug. 1990
305/7496697 Aug. 1990
904/3722960 Aug. 1990
407/9650814 Aug. 1991
305/6219749 Aug. 1991
305/8256561 Aug. 1990
305/6253912 Aug. 1990
407/8424442 June 1990
305/8211116 Aug. 1990
904/4726524 Aug. 1989

8. Iss A, Sec. 735-100-0905SB, pp. 5 - 7, MOOSA document attached
9. LMOS FE GENERIC 4 SOFTWARE, IMC CONVERSION/ MAINTENANCE PROCEDURES
10. Mechanized Loop Testing Enter Status Information Procedures, Automated Repair Service Bureau, Sec. 660-168-242, 7/83, index page and task 3, record IST
11. Jacksonville Operation Review, sec. H, SSMMP Classes of Service, Reviewers Hints
12. Dec. 20, 1988 memo from Brenda
13. 4/10/89 scr-ST2.chap4: CLOSE job, pp. 1-3
14. 1991 Maintenance Administrator Evaluation Plan with memos attached from K. McDonough 2/21/85; R.B. 3/11/87; Mary Crews 11/5/87
15. Selected Auto-Screener rules for MC 182, pp. 16, 4, 6
16. Handwritten notes titled OOS STATUSING
17. D.T. Houston letter to Operations Managers -- IMC/CRSAB, 7/28/89; file code 190.0201
18. D.W. Jones memo to vice presidents, 8/1/90; file code 255.0100

19. MTAS Report 00, for code N2262, 9/6/90; CON code review
20. R.R. Rupe letter to Operations Managers - NFA, 11/24/85
21. Richard Phillips memo to Lee Knight, Miami MAC, re: MLT VER codes for OOS statusing
22. Ray Kummer memo to All MAs, 8/22/84, re: OOS statusing
23. QR-8 Failures for January, 1/16/89
24. Statusing Troubles Out-of-Service, 3/28/91
25. Out of Service Troubles
26. Cherie Calvert memo to J. Long, J. Faller and M. Smoak, 4/3/91, re: March 1991 OOS > 24 hrs West Dade, Silver Oaks
27. TIMES
28. PSC QR-8 Cumulative Charts for Miami/Dade
29. H.W. Hay memo to General Managers -- Operations, 12/31/91; file code 010.1600
30. T.C. Taylor memo to Operations Managers - Network/Florida, 7/8/91 re: Closing Cable Failures
31. T.C. Taylor memo to Operations Managers - Network/Florida, 6/5/91 re: Bulk Statusing of Maintenance Tasks; file code 910.0301
32. SF1589aD150mo (8-12-87) PSC (Out of Service) Omitted Results
33. A. Brent memo on No Access Maintenance Troubles
34. South Sector Support memo to All MAs, 11/20/87; re: OOS Statusing for Dispatch
35. FPSC RULE 25-4.070, Interruption of Service Field Training Guide, Schedule 11, North Florida CSCC Staff, Oct. 1988
36. R.R. Rupe memo to All District Managers - I/M South Sector, 11/19/84 re: Renegotiated Appointments
37. OOS Troubles Flow Chart
38. David Jean memo to Gary Hall, 3/5/90, re: LMOS/MOOSA Audit Impact on LMOS Special Processing Requests
39. RF0838-IS Florida Interruption of Service Report RAO Summaries

40. MP-2312 Billing Verification Reports with customer telephone numbers redacted

DOCUMENTS NOT ATTACHED

These documents are not attached to this letter, but should be included in the documents that may be introduced during the panel deposition or at a later hearing.

41. BellSouth Practices:
660-169-011SV 1989 & 1991
660-165-031SV, MTAS MANUAL
660-168-001SV 1989
660-169-013SV, 1988, 1989, 1990, 1991
660-169-012SV, 1991
660-169-013BT, 1992
660-169-012BT, 1992
660-169-011BT, 1992
42. AT&T Bell Labs document (attached to Motion to Compel)
43. LMOS Operating System document, 17th POD, Item # 2 & 3 (attached to Motion to Compel)
44. RAO - RF0838-IS monthly summaries
45. RF35B20 forms produced
46. BellSouth CRIS User Guide, Vol. III, part 3, sec. 41, MOOSA (attached to Motion to Compel)
47. Revision #3 of Financial Systems Documentation FSD) RF57 CRIS, Nov. 13, 1990
48. LMOS Job Performance Aid*
49. MLT / VER code field manual*

* It is anticipated that these will be used for reference when referring to the various DLETHs and not necessarily entered as exhibits. It would be helpful if your panelists would provide their own copies for this purpose.

ATTACHMENT C: MAY 21, 1992 PANEL DEPOSITION EXCERPTS

RECEIVED
1

JUN 09 1992

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Office of
Public Counsel

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 & TELEGRAPH COMPANY'S)
repair service activities and reports)
)

DEPOSITION OF: SOUTHERN BELL TELEPHONE AND
TELEGRAPH COMPANY

PANEL MEMBERS: GARY HALL
RUDOLPH CHRISTIAN
APRIL IVY
GERARD PELLEGRINI
JERENE MASON

FPSC Hearing Room 122
Fletcher Building
101 East Gaines Street
Tallahassee, Florida

Met pursuant to notice at 8:35 a.m.
Thursday, May 21, 1992

REPORTED BY: LISA GIROD JONES, RPR, CM

RECEIVED
Division of Records & Reporting

JUN 1 1992

Florida Public Service Commission

W. PAUL RAYBORN & ASSOCIATES
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(904) 224-7642

DEPOSITION

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MR. HATCH: This is the deposition called by the Florida Public Service Commission of five separate panel members. Hank, the usual stipulations, do you want to go through this?

MR. ANTHONY: The usual stipulations, it was taken pursuant to proper notice, that we don't go off the record without the consent of the witnesses, in this instance, no waiver of reading and signing, and all objections are reserved except as to the form of the question. I think those are the four, aren't they?

MR. HATCH: Yes.

MR. ANTHONY: Is that agreeable with you, Sue?

MS. RICHARDSON: Yes.

MR. HATCH: The only addition to that is that I do not know at this point if we touch on any confidential stuff that may be confidential, may not be, jump in, if it appears that it might be. We don't have any specific documents in terms of -- but if we ask a question that leads that way, make sure that if we have to close the deposition or seal the transcript, we'll worry about that later. I want to make sure up front about that.

MR. ANTHONY: Along those lines, Tracy, you had sent to me a stack of documents that I assume you'll be using today. I looked through them and the other folks did

1 and I didn't see anything beyond what was redacted that
2 required confidential treatment, beyond what was already
3 redacted?

4 MS. RICHARDSON: Thank you.

5 MR. HATCH: Okay, we'll go ahead and take
6 appearances for the record purposes. To begin with, my name
7 is Tracy Hatch, 101 East Gaines Street, appearing on of the
8 behalf of the Commission Staff. Asking the questions this
9 morning will be Stan Greer. He is a class B practitioner,
0 also part the Commission Staff, same address.

1 MR. ANTHONY: On behalf of Southern Bell Telephone
2 and Telegraph Company, my name is Hank Anthony, and my
3 address is Suite 1910, 150 West Flagler Street, Miami,
4 Florida.

5 MS. RICHARDSON: My name is Sue Richardson. I'm
6 appearing on behalf of Public Counsel, address 111 West
7 Madison Street, Room 812, Tallahassee, Florida 32399.

8 MR. HATCH: That's it. I guess I'll go ahead and
9 start, turn it over to Stan.

0 MR. GREER: What I'd like to do today, or at least
1 this morning, is to get on the record how Southern Bell's
2 trouble repair system works, and I would like to progress
3 through from the time a customer sends the trouble or an
4 employee calls in a trouble, how it progresses through the
5 system, and if you want to do a little presentation or

**CERTIFICATE OF SERVICE
DOCKET NO. 920260-TL**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail or hand-delivery to the following parties on this 29th day of March, 1993.

Marshall Criser, III
BellSouth Telecommunications,
Inc. (Southern Bell Telephone
& Telegraph Company)
150 S. Monroe St., Suite 400
Tallahassee, FL 32301

Harris B. Anthony
BellSouth Telecommunications,
Inc. (Southern Bell Telephone
& Telegraph Company)
150 W. Flagler St., Suite 1910
Miami, FL 33130

Robin Norton
Division of Communications
Fla. Public Service Commission
101 East Gaines Street
Tallahassee, FL 32301

Doug Lackey
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& Telegraph Company)
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Mike Twomey
Department of Legal Affairs
Attorney General
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Florida AARP Capital City Task
Force
1923 Atapha Nene
Tallahassee, FL 32301

The American Association of
Retired Persons
c/o Bill L. Bryant, Jr.
Foley & Lardner
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Vicki Gordon Kaufman
McWhirter, Grandoff & Reeves
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Tallahassee, FL 32301

Rick Wright
AFAD
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Tallahassee, FL 32301

Peter M. Dunbar
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