

Southern Bell Telephone and Telegraph Company  
Florida Public Service Commission  
Docket No. ~~910163~~ TL 920260  
Public Counsel's Third Set of  
Interrogatories  
Item No. 1  
Page 1 of 1

REQUEST: Please state the exact names, home addresses and phone numbers, and business addresses and phone numbers of all persons known by you who have any knowledge about falsifying completion times on repair service forms, reports, or records.

RESPONSE: Southern Bell first notes that, to the extent that Interrogatory No. 1 seeks information related to Southern Bell's internal investigation regarding the subject matter of this docket, that investigation is not yet complete. Southern Bell further objects at this time to Interrogatory No. 1 on the ground that the information sought is privileged since it consists of attorney work product. This interrogatory exceeds the bounds of proper discovery because it requires an evaluation of the statements of the persons interviewed. Nonetheless, the information contained in the below described documents is not proprietary and Public Counsel may review the documents listed to determine the responsive information: See documents identified in response to Interrogatory No. 11-1.

ACK \_\_\_\_\_

AFA \_\_\_\_\_

INFORMATION PROVIDED BY: R. H. Lee, Jr.

APP \_\_\_\_\_

Manager

CAF \_\_\_\_\_

Room 36M66

CMU \_\_\_\_\_

675 W. Peachtree Street, N.E.  
Atlanta, GA 30375

GM \_\_\_\_\_

*Hennis R. Anthony*  
ATTORNEY

LEG \_\_\_\_\_

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OPC \_\_\_\_\_

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FPSC-RECORDS/REPORTING

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Southern Bell Telephone and Telegraph Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
Item No. 2  
Page 1 of 1

REQUEST: Please state the exact names, home addresses and phone numbers, and business addresses and phone numbers of all persons known by you who have any knowledge about falsifying commitment times on repair service forms, reports, or records.

RESPONSE: Southern Bell first notes that, to the extent that Interrogatory No. 2 seeks information related to Southern Bell's internal investigation regarding the subject matter of this docket, that investigation is not yet complete. Southern Bell further objects at this time to Interrogatory No. 2 on the grounds that the information sought is privileged since it consists of attorney work product. This interrogatory exceeds the bounds of proper discovery because it requires an evaluation of the witnesses' testimony. Nonetheless, the information contained in the below described documents is not proprietary and Public Counsel may review the documents listed to determine the responsive information; See documents identified in response to Interrogatory No. 11-2.

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Manager  
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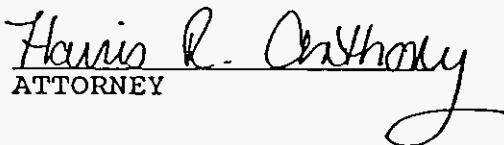
*Harris R. Anthony*  
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Southern Bell Telephone and Telegraph Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
Item No. 3  
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REQUEST: Please state the exact names, home addresses and phone numbers, and business addresses and phone numbers of all persons known by you who have any knowledge about recording out-of-service reports as affecting service on repair service forms, reports, or records.

RESPONSE: Southern Bell first notes that, to the extent that Interrogatory No. 3 seeks information related to Southern Bell's internal investigation regarding the subject matter of this docket, that investigation is not yet complete. Southern Bell further objects at this time to Interrogatory No. 3 on the grounds that the information sought is privileged since it consists of attorney work product. This interrogatory exceeds the bounds of proper discovery because it requires an evaluation of the witnesses' testimony. Nonetheless, the information contained in the below described documents is not proprietary and Public Counsel may review the documents listed to determine the responsive information; See documents identified in response to Interrogatory No. 11-3.

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Southern Bell Telephone and Telegraph Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
Item No. 4  
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REQUEST: Please state the exact names, home addresses and phone numbers, and business addresses and phone numbers of all persons known by you who have any knowledge about recording or reporting on repair service forms, reports, or records that an extension of time for repairs was granted by a customer when the customer was not contacted.

RESPONSE: Southern Bell first notes that, to the extent that Interrogatory No. 4 seeks information related to Southern Bell's internal investigation regarding the subject matter of this docket, that investigation is not yet complete. Southern Bell further objects at this time to Interrogatory No. 4 on the grounds that the information sought is privileged since it consists of attorney work product. This interrogatory exceeds the bounds of proper discovery because it requires an evaluation of the witnesses' testimony. Nonetheless, the information contained in the below described documents is not proprietary and Public Counsel may review the documents listed to determine the responsive information; See documents identified in response to Interrogatory No. 11-4.

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Southern Bell Telephone and Telegraph Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
Item No. 5  
Page 1 of 1

REQUEST: Please state the exact names, home addresses and phone numbers, and business addresses and phone numbers of all persons known by you who have any knowledge about reporting access denied by a customer, when access was not denied, on repair service forms, reports, or records.

RESPONSE: Southern Bell first notes that, to the extent that Interrogatory No. 5 seeks information related to Southern Bell's internal investigation regarding the subject matter of this docket, that investigation is not yet complete. Southern Bell further objects at this time to Interrogatory No. 5 on the grounds that the information sought is privileged since it consists of attorney work product. This interrogatory exceeds the bounds of proper discovery because it requires an evaluation of the witnesses' testimony. Nonetheless, the information contained in the below described documents is not proprietary and Public Counsel may review the documents listed to determine the responsive information: See documents identified in response to Interrogatory No. 11-5.

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Southern Bell Telephone and Telegraph Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
Item No. 6  
Page 1 of 1

REQUEST: Please state the exact names, home addresses and phone numbers, and business addresses and phone numbers of all persons known by you who have any knowledge about the use of recording improper exclusion codes on repair service forms, reports, or records.

RESPONSE: Southern Bell first notes that, to the extent that Interrogatory No. 6 seeks information related to Southern Bell's internal investigation regarding the subject matter of this docket, that investigation is not yet complete. Southern Bell further objects at this time to Interrogatory No. 6 on the grounds that the information sought is privileged since it consists of attorney work product. This interrogatory exceeds the bounds of proper discovery because it requires an evaluation of the witnesses' testimony. Nonetheless, the information contained in the below described documents is not proprietary and Public Counsel may review the documents listed to determine the responsive information: See documents identified in response to Interrogatory No. 11-6.

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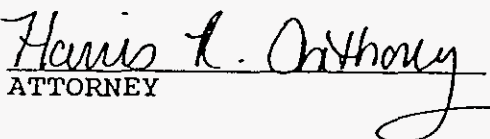
*Henris R. Anthony*  
ATTORNEY

Southern Bell Telephone and Telegraph Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
Item No. 7  
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REQUEST: Please state the exact names, home addresses and phone numbers, and business addresses and phone numbers of all persons known by you who have any knowledge about changing "test OK" repair service forms, reports or records to "out-of-service" repair service forms, reports, or records.

RESPONSE: Southern Bell first notes that, to the extent that Interrogatory No. 7 seeks information related to Southern Bell's internal investigation regarding the subject matter of this docket, that investigation is not yet complete. Southern Bell further objects at this time to Interrogatory No. 7 on the grounds that the information sought is privileged since it consists of attorney work product. This interrogatory exceeds the bounds of proper discovery because it requires an evaluation of the witnesses' testimony. Nonetheless, the information contained in the below described documents is not proprietary and Public Counsel may review the documents listed to determine the responsive information: See documents identified in response to Interrogatory No. 11-7.

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Southern Bell Telephone and Telegraph  
Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
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REQUEST: Please state the exact names, home addresses and phone numbers, and business addresses and phone numbers of all persons known by you who have any knowledge about subscriber repair reports recorded or reported as employee repair reports on repair service forms, reports, or records.

RESPONSE: Southern Bell first notes that, to the extent that Interrogatory No. 8 seeks information related to Southern Bell's internal investigation regarding the subject matter of this docket, that investigation is not yet complete. Southern Bell further objects at this time to Interrogatory No. 8 on the grounds that the information sought is privileged since it consists of attorney work product. This interrogatory exceeds the bounds of proper discovery because it requires an evaluation of the witnesses' testimony. Nonetheless, the information contained in the below described documents is not proprietary and Public Counsel may review the documents listed to determine the responsive information: See documents identified in response to Interrogatory No. 11-8.

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*Henris R. Anthony*  
ATTORNEY



Southern Bell Telephone and Telegraph Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
Item No. 9  
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REQUEST: Please state the exact names, home addresses and phone numbers, and business addresses and phone numbers of all persons known by you who have any knowledge about fictitious repair service forms, reports, or records.

RESPONSE: Southern Bell first notes that, to the extent that Interrogatory No. 9 seeks information related to Southern Bell's internal investigation regarding the subject matter of this docket, that investigation is not yet complete. Southern Bell further objects at this time to Interrogatory No. 9 on the grounds that the information sought is privileged since it consists of attorney work product. This interrogatory exceeds the bounds of proper discovery because it requires an evaluation of the witnesses' testimony. Nonetheless, the information contained in the below described documents is not proprietary and Public Counsel may review the documents listed to determine the responsive information: See documents identified in response to Interrogatory No. 11-9.

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Southern Bell Telephone and Telegraph Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
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Item No. 10  
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REQUEST: Please state the exact names, home addresses and phone numbers, and business addresses and phone numbers of all persons known by you who have any knowledge about repair service forms, reports, or records that are fraudulent or knowingly false in any respect.

RESPONSE: Southern Bell first notes that, to the extent that Interrogatory No. 10 seeks information related to Southern Bell's internal investigation regarding the subject matter of this docket, that investigation is not yet complete. Southern Bell further objects at this time to Interrogatory No. 10 on the grounds that the information sought is privileged since it consists of attorney work product. This interrogatory exceeds the bounds of proper discovery because it requires an evaluation of the witnesses' testimony. Nonetheless, the information contained in the below described documents is not proprietary and Public Counsel may review the documents listed to determine the responsive information: See documents identified in response to Interrogatory No. 11-10.

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Southern Bell Telephone and Telegraph Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
Item No. 11  
Page 1 of 1

REQUEST: Please identify every document in your possession, custody, or control which discusses, describes, implements, or evaluates:

- (1) Falsifying completion times on a repair service forms, reports, or records
- (2) Falsifying commitment times on repair service forms, reports, or records.
- (3) Recording out-of-service reports as affecting service on repair service forms, reports, or records.
- (4) Recording or reporting on repair service forms, reports, or records that an extension of time for repairs was granted by a customer when the customer was not contacted.
- (5) Reporting access denied by a customer, when access was not denied, on repair service forms, reports, or records.
- (6) The use of recording improper exclusion codes on repair service forms, reports, or records.
- (7) Changing "test OK" repair service forms, reports or records to "out-of-service" repair service forms, reports, or records.
- (8) Subscriber repair reports recorded or reported as employee repair reports on repair service forms, reports, or records.
- (9) Fictitious repair service forms, reports, or records.
- (10) Repair service forms, reports, or records that are fraudulent or knowingly false in any respect.

Southern Bell Telephone and Telegraph Company  
Florida Public Service Commission  
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RESPONSE: Southern Bell does not believe that it was Public Counsel's intent to require Southern Bell to identify the same documents previously or contemporaneously identified or produced in this or other dockets, but to the extent it does, Southern Bell objects on the basis that such a request would be unduly burdensome, oppressive and unnecessary, and for these reasons is prohibited. To the extent that this interrogatory seeks information related to Southern Bell's internal investigation regarding the subject matter of this docket, Southern Bell first notes that this investigation is not yet complete and thus this interrogatory is premature. Moreover, Southern Bell objects to this interrogatory at this time on the ground that such information is privileged as attorney work product.

Notwithstanding the foregoing objection, Southern Bell can identify the following documents, which are not privileged as being responsive to this request:

1. Memorandum from P. Hamilton to H. B. Martin, Jr., R. P. Grieco and G. W. Fortner dated April 7, 1983
2. Security Report, Title: Frank Falsetti, dated March 3, 1989
3. Memorandum to "All MA's", Subject: OOS Troubles, undated, unsigned
4. Memorandum - OOS Statusing dated August 23, 1985, unsigned
5. Memorandum to "All MA's", Subject: OOS Troubles, dated November 8, 1985, unsigned
6. Letter, undated, "To Whom It May Concern" from George B. Espinosa

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Southern Bell Telephone and Telegraph  
Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
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Page 1 of 1

RESPONSE: Southern Bell does not believe that it was Public Counsel's intent to require Southern Bell to identify the same documents previously or contemporaneously identified or produced in this or other dockets, but to the extent it does, Southern Bell objects on the basis that such a request would be unduly burdensome, oppressive and unnecessary, and for these reasons is prohibited. To the extent that this interrogatory seeks information related to Southern Bell's internal investigation regarding the subject matter of this docket, Southern Bell first notes that this investigation is not yet complete and thus this interrogatory is premature. Moreover, Southern Bell objects to this interrogatory at this time on the ground that such information is privileged as attorney work product.

Notwithstanding the foregoing objection, Southern Bell can identify the following documents, which are not privileged as being responsive to this request:

None

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Southern Bell Telephone and Telegraph  
Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
Item No. 11-3  
Page 1 of 2

RESPONSE: Southern Bell does not believe that it was Public Counsel's intent to require Southern Bell to identify the same documents previously or contemporaneously identified or produced in this or other dockets, but to the extent it does, Southern Bell objects on the basis that such a request would be unduly burdensome, oppressive and unnecessary, and for these reasons is prohibited. To the extent that this interrogatory seeks information related to Southern Bell's internal investigation regarding the subject matter of this docket, Southern Bell first notes that this investigation is not yet complete and thus this interrogatory is premature. Moreover, Southern Bell objects to this interrogatory at this time on the ground that such information is privileged as attorney work product.

Notwithstanding the foregoing objection, Southern Bell can identify the following documents, which are not privileged as being responsive to this request:

1. Memo to All Maintenance Administrators, dated September 6, 1983, unsigned
2. Memo to Operations Managers, IMC/Florida, re: Clarification of Out of Service Customer Reports, dated June 17, 1987, unsigned
3. Letter to L. E. Crittenden from N. D'Alessio, dated December 29, 1990
4. Memorandum to All Maintenance Administrators, Subject: OOS Troubles, undated, unsigned

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Southern Bell Telephone and Telegraph  
Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
Item No. 11-3  
Page 2 of 2

5. Memorandum - "Copy: All Managers - Inside/Out and Maintenance Administrators, undated, unsigned
6. Memorandum - "OOS Statusing", dated August 23, 1985, unsigned
7. Memorandum - "All Maintenance Administrators", "Subject OOS Troubles", Dated November 8, 1985, unsigned

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ATTORNEY

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0000015

Southern Bell Telephone and Telegraph  
Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
Item No. 11-4  
Page 1 of 1

RESPONSE: Southern Bell does not believe that it was Public Counsel's intent to require Southern Bell to identify the same documents previously or contemporaneously identified or produced in this or other dockets, but to the extent it does, Southern Bell objects on the basis that such a request would be unduly burdensome, oppressive and unnecessary, and for these reasons is prohibited. To the extent that this interrogatory seeks information related to Southern Bell's internal investigation regarding the subject matter of this docket, Southern Bell first notes that this investigation is not yet complete and thus this interrogatory is premature. Moreover, Southern Bell objects to this interrogatory at this time on the ground that such information is privileged as attorney work product.

Notwithstanding the foregoing objection, Southern Bell can identify the following documents, which are not privileged as being responsive to this request:

1. Security Report, Title: Gainesville, Florida IMC,  
Dated January 22, 1991

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Southern Bell Telephone and Telegraph  
Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
Item No. 11-5  
Page 1 of 1

RESPONSE: Southern Bell does not believe that it was Public Counsel's intent to require Southern Bell to identify the same documents previously or contemporaneously identified or produced in this or other dockets, but to the extent it does, Southern Bell objects on the basis that such a request would be unduly burdensome, oppressive and unnecessary, and for these reasons is prohibited. To the extent that this interrogatory seeks information related to Southern Bell's internal investigation regarding the subject matter of this docket, Southern Bell first notes that this investigation is not yet complete and thus this interrogatory is premature. Moreover, Southern Bell objects to this interrogatory at this time on the ground that such information is privileged as attorney work product.

Notwithstanding the foregoing objection, Southern Bell can identify the following documents, which are not privileged as being responsive to this request:

1. Letter "To Whom It May Concern" from Jorge B. Espinosa, undated

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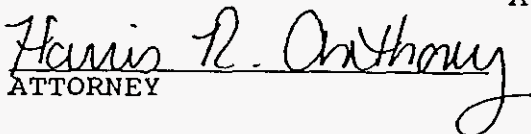
Southern Bell Telephone and Telegraph  
Company  
Florida Public Service Commission  
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Public Counsel's Third Set of  
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Item No. 11-6  
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RESPONSE: Southern Bell does not believe that it was Public Counsel's intent to require Southern Bell to identify the same documents previously or contemporaneously identified or produced in this or other dockets, but to the extent it does, Southern Bell objects on the basis that such a request would be unduly burdensome, oppressive and unnecessary, and for these reasons is prohibited. To the extent that this interrogatory seeks information related to Southern Bell's internal investigation regarding the subject matter of this docket, Southern Bell first notes that this investigation is not yet complete and thus this interrogatory is premature. Moreover, Southern Bell objects to this interrogatory at this time on the ground that such information is privileged as attorney work product.

Notwithstanding the foregoing objection, Southern Bell can identify the following documents, which are not privileged as being responsive to this request:

1. Letter to L. E. Crittenden from N. D'Alessio, dated November 29, 1990
2. Memo to: All Maintenance Administrators, Subject: Cable Failure, OEF's and OOS over 24 hours, from John R. Melton, dated February 21, 1990
3. Memo to All Maintenance Administrators from Kay McDonough, dated March 21, 1986

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Southern Bell Telephone and Telegraph  
Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
Item No. 11-7  
Page 1 of 2

RESPONSE: Southern Bell does not believe that it was Public Counsel's intent to require Southern Bell to identify the same documents previously or contemporaneously identified or produced in this or other dockets, but to the extent it does, Southern Bell objects on the basis that such a request would be unduly burdensome, oppressive and unnecessary, and for these reasons is prohibited. To the extent that this interrogatory seeks information related to Southern Bell's internal investigation regarding the subject matter of this docket, Southern Bell first notes that this investigation is not yet complete and thus this interrogatory is premature. Moreover, Southern Bell objects to this interrogatory at this time on the ground that such information is privileged as attorney work product.

Notwithstanding the foregoing objection, Southern Bell can identify the following documents, which are not privileged as being responsive to this request:

1. Letter to L. E. Crittenden from N. D'Alessio, dated November 29, 1990
2. Letter to B. F. Skinner from N. D'Alessio, dated January 10, 1991
3. Letter to B. F. Skinner from N. D'Alessio, dated January 2, 1991
4. Letter to L. Isenhour from Maintenance Administrators, undated
5. Letter to L. E. Crittenden from N. D'Alessio, dated December 26, 1990
6. Security Report, Title: Joseph A. Lesko and Nancy D'Alessio, dated October 30, 1990

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Southern Bell Telephone and Telegraph  
Company  
Florida Public Service Commission  
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RESPONSE:

7. Security Report, Title: Gainesville, Fla IMC, dated January 22, 1991
8. Letter to Richard K. Snelling from Joseph A. Lesko, dated March 13, 1991
9. Various repair records for the North Dade IMC for the period August 27, 1990 to August 31, 1990

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Southern Bell Telephone and Telegraph  
Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
Item No. 11-8  
Page 1 of 1

RESPONSE: Southern Bell does not believe that it was Public Counsel's intent to require Southern Bell to identify the same documents previously or contemporaneously identified or produced in this or other dockets, but to the extent it does, Southern Bell objects on the basis that such a request would be unduly burdensome, oppressive and unnecessary, and for these reasons is prohibited. To the extent that this interrogatory seeks information related to Southern Bell's internal investigation regarding the subject matter of this docket, Southern Bell first notes that this investigation is not yet complete and thus this interrogatory is premature. Moreover, Southern Bell objects to this interrogatory at this time on the ground that such information is privileged as attorney work product.

Notwithstanding the foregoing objection, Southern Bell can identify the following documents, which are not privileged as being responsive to this request:

None

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0000021

Southern Bell Telephone and Telegraph  
Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
Item No. 11-9  
Page 1 of 1

RESPONSE: Southern Bell does not believe that it was Public Counsel's intent to require Southern Bell to identify the same documents previously or contemporaneously identified or produced in this or other dockets, but to the extent it does, Southern Bell objects on the basis that such a request would be unduly burdensome, oppressive and unnecessary, and for these reasons is prohibited. To the extent that this interrogatory seeks information related to Southern Bell's internal investigation regarding the subject matter of this docket, Southern Bell first notes that this investigation is not yet complete and thus this interrogatory is premature. Moreover, Southern Bell objects to this interrogatory at this time on the ground that such information is privileged as attorney work product.

Notwithstanding the foregoing objection, Southern Bell can identify the following documents, which are not privileged as being responsive to this request:

1. Security Report, Title: Thomas N. Reeves, dated January 14, 1991
2. Security Report, Title: Robert L. Clanton, dated January 11, 1991
3. Security Report, Title: Lee Jackson, dated February 7, 1991
4. Security Report, Title: Rick Lee Adams, dated February 18, 1991
5. Security Report, Title: Jim Richard Slater, dated February 7, 1991
6. Various repair records for the Gainesville IMC during the period September 1, 1990 through September 30, 1990
7. Various documents identified in 11-1 through 11-7

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Southern Bell Telephone and Telegraph  
Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
Item No. 11-10  
Page 1 of 1

RESPONSE: Southern Bell does not believe that it was Public Counsel's intent to require Southern Bell to identify the same documents previously or contemporaneously identified or produced in this or other dockets, but to the extent it does, Southern Bell objects on the basis that such a request would be unduly burdensome, oppressive and unnecessary, and for these reasons is prohibited. To the extent that this interrogatory seeks information related to Southern Bell's internal investigation regarding the subject matter of this docket, Southern Bell first notes that this investigation is not yet complete and thus this interrogatory is premature. Moreover, Southern Bell objects to this interrogatory at this time on the ground that such information is privileged as attorney work product.

Notwithstanding the foregoing objection, Southern Bell can identify the following documents, which are not privileged as being responsive to this request:

1. Various documents identified in 11-1 through 11-7 and 11-9
2. Letter from J. A. Taylor, Public Service Commission, to Arthur W. B. Tifford, Attorney, dated December 12, 1987

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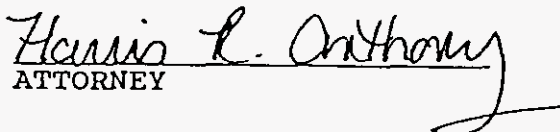
*Harris R. Anthony*  
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Southern Bell Telephone and Telegraph Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
Item No. 12  
Page 1 of 1

REQUEST: Please provide the name, address, and telephone number of each customer with a repair service order, form or record that, to your knowledge, information or belief, has a falsified completion time for the repair. Please also provide the dates over which the repair was accomplished or attempted.

RESPONSE: To the extent that this interrogatory seeks information relating to Southern Bell's internal investigation regarding the subject matter of this docket, Southern Bell first notes that this investigation is not yet complete and thus this interrogatory is premature. Moreover, Southern Bell objects at this time to this interrogatory on the ground that to the extent such information is contained in that internal investigation such information is privileged as attorney work product. Disregarding what may or may not be contained in the internal investigation, Southern Bell has no information which it can identify that is responsive to this interrogatory.

INFORMATION PROVIDED BY: R. H. Lee, Jr., Manager  
Room 36M66  
675 W. Peachtree Street, N.E.  
Atlanta, GA 30375

  
ATTORNEY

F03A03Y

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Southern Bell Telephone and Telegraph Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
Item No. 13  
Page 1 of 1

REQUEST: Please provide the name, address, and telephone number of each customer with a repair service order, form or record that, to your knowledge, information or belief, showed the service as out-of-service when it should have been shown as affecting service. Please also provide the dates over which the repair was accomplished or attempted.

RESPONSE: To the extent that this interrogatory seeks information relating to Southern Bell's internal investigation regarding the subject matter of this docket, Southern Bell first notes that this investigation is not yet complete and thus this interrogatory is premature. Moreover, Southern Bell objects at this time to this interrogatory on the ground that to the extent such information is contained in that internal investigation such information is privileged as attorney work product. Disregarding what may or may not be contained in the internal investigation, Southern Bell has no information which it can identify that is responsive to this Interrogatory.

INFORMATION PROVIDED BY: R. H. Lee, Jr., Manager  
Room 36M66  
675 W. Peachtree Street, N.E.  
Atlanta, GA 30375

*Harris R. Anthony*  
ATTORNEY

F03A03Y

0000025

Southern Bell Telephone and Telegraph Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
Item No. 14  
Page 1 of 1

REQUEST: Please provide the name, address, and telephone number of each customer with a repair service order, form or record that, to your knowledge, information or belief, showed the service as out-of-service when it should have been shown a affecting service. Please also provide the dates over which the repair was accomplished or attempted.

RESPONSE: To the extent that this interrogatory seeks information relating to Southern Bell's internal investigation regarding the subject matter of this docket, Southern Bell first notes that this investigation is not yet complete and thus this interrogatory is premature. Moreover, Southern Bell objects at this time to this interrogatory on the ground that to the extent such information is contained in that internal investigation such information is privileged as attorney work product. Disregarding what may or may not be contained in the internal investigation, Southern Bell has no information which it can identify that is responsive to this Interrogatory.

INFORMATION PROVIDED BY: R. H. Lee, Jr., Manager  
Room 36M66  
675 W. Peachtree Street, N.E.  
Atlanta, GA 30375

  
ATTORNEY

Southern Bell Telephone and Telegraph Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
Item No. 15  
Page 1 of 1

REQUEST: Please provide the name, address, and telephone number of each customer with a repair service order, form or record that, to your knowledge, information or belief, showed that an extension of time for repairs was granted by a customer when the customer was not contacted. Please also provide the dates over which the repair was accomplished or attempted.

RESPONSE: To the extent that this interrogatory seeks information relating to Southern Bell's internal investigation regarding the subject matter of this docket, Southern Bell first notes that this investigation is not yet complete and thus this interrogatory is premature. Moreover, Southern Bell objects at this time to this interrogatory on the ground that to the extent such information is contained in that internal investigation such information is privileged as attorney work product. Disregarding what may or may not be contained in the internal investigation, Southern Bell has no information which it can identify that is responsive to this Interrogatory.

INFORMATION PROVIDED BY: R. H. Lee, Jr., Manager  
Room 36M66  
675 W. Peachtree Street, N.E.  
Atlanta, GA 30375

*Harris R. Anthony*  
ATTORNEY

Southern Bell Telephone and Telegraph Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
Item No. 16  
Page 1 of 1

REQUEST: Please provide the name, address, and telephone number of each customer with a repair service order, form or record that, to your knowledge, information or belief, showed a report of access denied by a customer, when access was not denied. Please also provide the dates over which the repair was accomplished or attempted.

RESPONSE: To the extent that this interrogatory seeks information relating to Southern Bell's internal investigation regarding the subject matter of this docket, Southern Bell first notes that this investigation is not yet complete and thus this interrogatory is premature. Moreover, Southern Bell objects at this time to this interrogatory on the ground that to the extent such information is contained in that internal investigation such information is privileged as attorney work product. Disregarding what may or may not be contained in the internal investigation, Southern Bell has no information which it can identify that is responsive to this Interrogatory.

INFORMATION PROVIDED BY: R. H. Lee, Jr., Manager  
Room 36M66  
675 W. Peachtree Street, N.E.  
Atlanta, GA 30375

Henris L. Anthony  
ATTORNEY

F03A03Y

0000023

Southern Bell Telephone and Telegraph Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
Item No. 17  
Page 1 of 1

REQUEST: Please provide the name, address, and telephone number of each customer with a repair service order, form or record that, to your knowledge, information or belief, showed the use of improper exclusion codes. Please also provide the dates over which the repair was accomplished or attempted.

RESPONSE: To the extent that this interrogatory seeks information relating to Southern Bell's internal investigation regarding the subject matter of this docket, Southern Bell first notes that this investigation is not yet complete and thus this interrogatory is premature. Moreover, Southern Bell objects at this time to this interrogatory on the ground that to the extent that such information is contained in that internal investigation such information is privileged as attorney work product. Disregarding what may or may not be contained in the internal investigation, Southern Bell has no information which it can identify that is responsive to this Interrogatory.

INFORMATION PROVIDED BY: R. H. Lee, Jr., Manager  
Room 36M66  
675 W. Peachtree Street, N.E.  
Atlanta, GA 30375

Harris A. Anthony  
ATTORNEY

Southern Bell Telephone and Telegraph Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
Item No. 18  
Page 1 of 1

REQUEST: Please provide the name, address, and telephone number of each customer with a repair service order, form or record that, to your knowledge, information or belief, was changed from "test OK" to "out of service." Please also provide the dates over which the repair was accomplished or attempted.

RESPONSE: To the extent that this interrogatory seeks information relating to Southern Bell's internal investigation regarding the subject matter of this docket, Southern Bell first notes that this investigation is not yet complete and thus this interrogatory is premature. Moreover, Southern Bell objects at this time to this interrogatory on the ground that to the extent that such information is contained in that internal investigation such information is privileged as attorney work product. Disregarding what may or may not be contained in the internal investigation, please see Attachment I appended hereto.

INFORMATION PROVIDED BY: R. H. Lee, Jr., Manager  
Room 36M66  
675 W. Peachtree Street, N.E.  
Atlanta, GA 30375

*Harris R Anthony*  
ATTORNEY

F03A03Y

0000030

Southern Bell Telephone and Telegraph  
Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
Item No. 18 - Attachment I  
Page 1 of 5

The following list of accounts are the ones scored as errors during the North Dade Procedure and Statusing Review for the period August 1, 1990 to August 31, 1990. All errors resulted because the reports did not qualify for out of service scoring per existing guidelines and practices. All reports scored as errors were closed between August 27, 1991 and August 31, 1991 even though the whole month was sampled.

INFORMATION PROVIDED BY: R. H. Lee, Jr., Manager  
Room 36M66  
675 W. Peachtree Street, N.E.  
Atlanta, GA 30375

F03A03Y

0000031

ATTACHMENT 1

INFORMATION REDACTED

F03A03Y

0000032



- 3 (305) 477-1813
- 4
- 5 (305) 556-8907
- 6
- 7
- 8 (305) 558-0074
- 9
- 10
- 11 (305) 558-5234
- 12
- 13
- 14 (305) 591-3091
- 15
- 16
- 17 (305) 591-5611
- 18
- 19
- 20 (305) 592-7777
- 21
- 22
- 23 (305) 620-0688
- 24
- 25
- 26 (305) 620-4620
- 27
- 28
- 29
- 30 (305) 620-8699
- 31
- 32
- 33 (305) 621-5423
- 34
- 35
- 36 (305) 625-1096
- 37
- 38
- 39 (305) 625-8728
- 40
- 41
- 42 (305) 651-1425
- 43
- 44

1 (305) 651-5208

2

3

4 (305) 652-2169

5

6

7

8 (305) 652-5045

9

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11

12 (305) 652-8082

13

14

15 (305) 653-6878

16

17

18 (305) 681-0370

19

20

21 (305) 685-2883

22

23

24 (305) 685-6012

25

26

27 (305) 687-0051

28

29

30 (305) 688-0502

31

32

33 (305) 688-9727

34

35

36 (305) 770-1348

37

38

39 (305) 822-8100

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41

42 (305) 823-6281

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1 (305) 825-0164  
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3

4 (305) 826-9432  
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7 (305) 827-4527  
8  
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11 (305) 828-6051  
12  
13  
14

15 (305) 884-2424  
16  
17  
18

19 (305) 885-0135  
20  
21

22 (305) 887-4876  
23  
24

25 (305) 888-0050  
26  
27

28 (305) 889-0114  
29  
30  
31

32 (305) 931-8451  
33  
34

35 (305) 935-3735  
36  
37  
38

Southern Bell Telephone and Telegraph Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
Item No. 19  
Page 1 of 1

REQUEST: Please provide the name, address, and telephone number of each customer with a repair service order, form or record that, to your knowledge, information or belief, should have been recorded as a subscriber repair report but was instead recorded as an employee repair report. Please also provide the dates over which the repair was accomplished or attempted.

RESPONSE: To the extent that this interrogatory seeks information relating to Southern Bell's internal investigation regarding the subject matter of this docket, Southern Bell first notes that this investigation is not yet complete and thus this interrogatory is premature. Moreover, Southern Bell objects at this time to this interrogatory on the ground that to the extent that such information is contained in that internal investigation such information is privileged as attorney work product. Disregarding what may or may not be contained in the internal investigation which it can identify that is responsive to this Interrogatory.

INFORMATION PROVIDED BY: R. H. Lee, Jr., Manager  
Room 36M66  
675 W. Peachtree Street, N.E.  
Atlanta, GA 30375

Harris R. Anthony  
ATTORNEY

F03A03Y

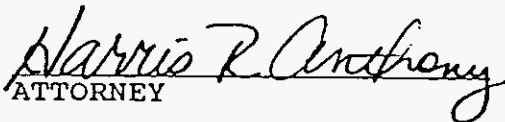
0000036

Southern Bell Telephone and Telegraph  
Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
Item No. 20  
Page 1 of 1

REQUEST: Please provide the name, address, and telephone number of each customer with a repair service order, form or record that, to your knowledge, information or belief, was fictitious in any respect. Please also provide the dates over which the repair was reported, accomplished or attempted.

RESPONSE: To the extent that this interrogatory seeks information relating to Southern Bell's internal investigation regarding the subject matter of this docket, Southern Bell first notes that this investigation is not yet complete and thus this interrogatory is premature. Moreover, Southern Bell objects at this time to this interrogatory on the ground that to the extent that such information is contained in that internal investigation such information is privileged as attorney work product. Disregarding what may or may not be contained in the internal investigation, please see Attachments I and II appended hereto.

INFORMATION PROVIDED BY: R. H. Lee, Jr., Manager  
Room 36M66  
675 W. Peachtree Street, N.E.  
Atlanta, GA 30375

  
ATTORNEY

Southern Bell Telephone and Telegraph  
Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
Item No. 20 - Attachment I  
Page 1 of 4

The attached list provides this information for the period  
September 1, 1990 through September 30, 1990. It is related to  
the Gainesville IMC.

INFORMATION PROVIDED BY: R. H. Lee, Jr., Manager  
Room 36M66  
675 W. Peachtree Street, N.E.  
Atlanta, GA 30375

F03A03Y

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ATTACHMENT 1

INFORMATION REDACTED

1	473-7333	473-3798
2		
3		
4		
5	473-2186	473-4296
6		
7		
8		
9	473-3633	473-3163
10		
11		
12		
13	473-4438	473-7342
14		
15		
16		
17	473-7074	473-9484
18		
19		
20		
21	473-4315	473-9351
22		
23		
24		
25	473-3434	473-4775
26		
27		
28		
29		
30	473-7861	473-3568
31		
32		
33	473-4435	473-0869
34		
35		
36		



1 2 3 4	472-6247	472-3536
5 6 7 8	472-4223	472-4363
9 10 11 12	472-3612	472-4638
13 14 15 16	472-2228	472-2738
17 18 19 20	472-4112	472-2106
21 22 23 24	472-4541	472-6325
25 26 27 28	472-3558	472-3121
29 30 31 32	472-2975	472-3266
33 34 35 36	472-2370	

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481-2804

481-2593

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9

481-9247

481-2951

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12  
13

481-4122

481-2201

14  
15  
16  
17

481-4591

18  
19  
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21

481-2685

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23  
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481-7030

26  
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481-2149

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481-7018

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35  
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481-4564

Southern Bell Telephone and Telegraph  
Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
Item No. 20 - Attachment II  
Page 1 of 2

The attached list provides this information for the period  
September, 1989 through December, 1990. It is related to the  
Jacksonville IMC.

INFORMATION PROVIDED BY: R. H. Lee, Jr., Manager  
Room 36M66  
675 W. Peachtree Street, N.E.  
Atlanta, GA 30375

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ATTACHMENT 2

INFORMATION REDACTED

F03A03Y

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ATTACHMENT II

1	904-247-9860	904-233-0503
2		
3	904-249-1771	904-233-2051
4		
5	904-246-7943	904-235-0366
6		
7	904-247-1732	904-263-3538
8		
9	904-249-9798	904-263-3816
10		
11	904-249-4789	904-539-5632
12		
13	904-241-7970	904-539-9384
14		
15	904-246-7877	904-539-5318
16		
17	904-241-9282	
18		
19	904-241-9282	
20	-	
21	904-249-7552	
22		
23	904-246-6582	
24		

Southern Bell Telephone and Telegraph  
Company  
Florida Public Service Commission  
Docket No. 910163-TL  
Public Counsel's Third Set of  
Interrogatories  
Item No. 21  
Page 1 of 1

REQUEST: Please provide the name, address, and telephone number of each customer with a repair service order, form or record that, to your knowledge, information or belief, was fraudulent or knowingly false in any respect. Please also provide the dates over which the repair reported, accomplished or attempted.

RESPONSE: To the extent that this interrogatory seeks information relating to Southern Bell's internal investigation regarding the subject matter of this docket, Southern Bell first notes that this investigation is not yet complete and thus this interrogatory is premature. Moreover, Southern Bell objects at this time to this interrogatory on the ground that to the extent that such information is contained in that internal investigation such information is privileged as attorney work product. Disregarding what may or may not be contained in the internal investigation which it can identify that is responsive to this Interrogatory.

INFORMATION PROVIDED BY: R. H. Lee, Jr., Manager  
Room 36M66  
675 W. Peachtree Street, N.E.  
Atlanta, GA 30375

Harris R. Anthony  
ATTORNEY

STATE OF GEORGIA  
COUNTY OF FULTON

BEFORE ME, the undersigned authority, personally appeared Raymond H. Lee, who being first duly sworn deposes and says:

That he occupies the position of Manager, Headquarters Regulatory and is the person who has furnished answer(s) to these interrogatory(ies) No. 1-21 and further says that said answer(s) are true and correct to the best of his knowledge and belief.

WITNESS my hand and seal this 8<sup>th</sup> day of July, A.D., 1991.

Signature Raymond H. Lee

Edeltraud M. Sales  
Notary Public

State of Georgia

My Commission Expires:

January 25, 1993

CERTIFICATE OF SERVICE  
Docket No. 910163-TL

I HEREBY CERTIFY that a copy of the foregoing has been  
furnished by United States Mail this 8th day of July, 1991,  
to:

Charles J. Beck  
Assistant Public Counsel  
111 W. Madison Street  
Room 812  
Tallahassee, Florida 32399-1400

Robert Vandiver  
Division of Legal Services  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32399-0863

Tracy Hatch  
Division of Legal Services  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32399-0863



A handwritten signature in cursive script, appearing to read "R. Vandiver", is written over a horizontal line.



Harris R. Anthony  
General Counsel-Florida

Southern Bell Telephone  
and Telegraph Company  
c/o Marshall Criser III  
Suite 400  
150 South Monroe St.  
Tallahassee, Florida 32301  
Phone (305) 530-5555

February 26, 1993

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

Re: Docket No. 910163-TL

Dear Mr. Tribble:

This letter is to notify you that today Southern Bell Telephone and Telegraph Company provided a supplemental response to Public Counsel's Third Set of Interrogatories Nos. 1 through 10, dated June 6, 1991 and Fifth Set of Interrogatories dated June 11, 1991, in the above-referenced docket. The original and one copy have been furnished to Charles J. Beck, Deputy Public Counsel.

A copy of this letter is enclosed. Please mark it to indicate that it was received and return the copy to me.

Sincerely yours,

*Harris R. Anthony*  
Harris R. Anthony  
(24)

Enclosures

cc: All Parties of Record  
A. M. Lombardo  
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 *26<sup>th</sup>* day of *Feb.*, 1993

to:

Robin Norton  
Division of Communications  
Florida Public Service  
Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0866

Tracy Hatch  
Division of Legal Services  
Florida Public Svc. Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0863

Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter, Grandoff & Reeves  
315 South Calhoun Street  
Suite 716  
Tallahassee, Florida 32301  
atty for FIXCA

Joseph Gillan  
J. P. Gillan and Associates  
Post Office Box 541038  
Orlando, Florida 32854-1038

Patrick K. Wiggins  
Wiggins & Villacorta, P.A.  
Post Office Drawer 1657  
Tallahassee, Florida 32302  
atty for Intermedia and Cox

Laura L. Wilson, Esq.  
Messer, Vickers, Caparello,  
Madsen, Lewis & Metz, PA  
Post Office Box 1876  
Tallahassee, FL 32302  
atty for FPTA

Charles J. Beck  
Deputy Public Counsel  
Office of the Public Counsel  
111 W. Madison Street  
Room 812  
Tallahassee, FL 32399-1400

Michael J. Henry  
MCI Telecommunications Corp.  
MCI Center  
Three Ravinia Drive  
Atlanta, Georgia 30346-2102

Richard D. Meison  
Hopping Boyd Green & Sams  
Post Office Box 6526  
Tallahassee, Florida 32314  
atty for MCI

Rick Wright  
Regulatory Analyst  
Division of Audit and Finance  
Florida Public Svc. Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0865

Peter M. Dunbar  
Haben, Culpepper, Dunbar  
& French, P.A.  
306 North Monroe Street  
Post Office Box 10095  
Tallahassee, FL 32301  
atty for FCTA

Chanthina R. Bryant  
Sprint  
3065 Cumberland Circle  
Atlanta, GA 30339

Michael W. Tye  
AT&T Communications of the  
Southern States, Inc.  
106 East College Avenue  
Suite 1410  
Tallahassee, Florida 32301

Dan B. Hendrickson  
Post Office Box 1201  
Tallahassee, FL 32302  
atty for FCAN

Benjamin H. Dickens, Jr.  
Blooston, Mordkofsky,  
Jackson & Dickens  
2120 L Street, N.W.  
Washington, DC 20037  
Atty for Fla Ad Hoc

C. Everett Boyd, Jr.  
Ervin, Varn, Jacobs, Odom  
& Ervin  
305 South Gadsen Street  
Post Office Drawer 1170  
Tallahassee, Florida 32302  
atty for Sprint

Florida Pay Telephone  
Association, Inc.  
c/o Mr. Lance C. Norris  
President  
Suite 202  
8130 Baymeadows Circle, West  
Jacksonville, FL 32256

Monte Belote  
Florida Consumer Action Network  
4100 W. Kennedy Blvd., #128  
Tampa, FL 33609

Bill L. Bryant, Jr., Esq.  
Foley & Lardner  
Suite 450  
215 South Monroe Street  
Tallahassee, FL 32302-0508  
Atty for AARP

Michael B. Twomey  
Assistant Attorney General  
Department of Legal Affairs  
Room 1603, The Capitol  
Tallahassee, FL 32399-1050

Mr. Douglas S. Metcalf  
Communications Consultants,  
Inc.  
631 S. Orlando Ave., Suite 250  
P. O. Box 1148  
Winter Park, FL 32790-1148

Mr. Cecil O. Simpson, Jr.  
General Attorney  
Mr. Peter Q. Nyce, Jr.  
General Attorney  
Regulatory Law Office  
Office of the Judge  
Advocate General  
Department of the Army  
901 North Stuart Street  
Arlington, VA 22203-1837

Mr. Michael Fannon  
Cellular One  
2735 Capital Circle, NE  
Tallahassee, FL 32308

Floyd R. Self, Esq.  
Messer, Vickers, Caparello,  
Madsen, Lewis, Goldman & Metz  
Post Office Box 1876  
Tallahassee, FL 32302-1876  
Attys for McCaw Cellular

Angela Green  
Division of Legal Services  
Florida Public Svc. Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0863

Stan Greer  
Division of Communications  
Florida Public Svc. Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0863

*Harris R. Anthony*

#540

Harris R. Anthony  
General Counsel-Florida

Southern Bell Telephone  
and Telegraph Company  
c/o Marshall Criser III  
Suite 400  
150 South Monroe St.  
Tallahassee, Florida 32301  
Phone (305) 530-5555

February 25, 1993

Charles J. Beck  
Deputy Public Counsel  
Office of the Public Counsel  
111 W. Madison St.  
Room 812  
Tallahassee, FL 32399-1400

Re: Public Counsel's Third and Fifth Sets of Interrogatories  
Docket No. 910163-TL

Dear Mr. Beck:

Enclosed are the original and one copy of the Supplemental Responses to Items 1 through 10 of Public Counsel's Third set of Interrogatories dated June 6, 1991, and Items 1 and 2 of Public Counsel's Fifth set of Interrogatories dated June 11, 1991. The information contained in the enclosed Responses is being provided pursuant to Order of the Florida Supreme Court dated February 4, 1993. By providing the information pursuant to the Supreme Court's Order, Southern Bell does not intend to waive the attorney-client privilege or work product protection and reserves the right to assert the attorney-client privilege and work product protection if this information is requested by any other person including, but not limited to, requests that may be made in pending or future litigation, administrative proceedings or any other action or proceeding.

Southern Bell reserves the right to refute or contest certain of the information, beliefs, claims and conclusions that previously have been offered by the persons identified in the responses to Items 1 through 10, or which they may offer in the future.

Sincerely,

*Harris R. Anthony*  
Harris R. Anthony  
(2)

Enclosures

cc: A.M. Lombardo  
R.D. Lackey  
All Parties of Record

Southern Bell Telephone and Telegraph Company  
FPSC Docket No. 910163-TL  
Citizens' Third Set of Interrogatories  
June 6, 1991  
Item No. 1  
Page 1 of 25

REQUEST: Please state the exact names, home addresses and phone number, and business addresses and phone numbers of all persons known by you who have any knowledge about falsifying completion times on repair service forms, reports, or records.

RESPONSE: The following individuals may have information responsive to this interrogatory. The information contained in the enclosed Responses is being provided pursuant to Order of the Florida Supreme Court dated February 4, 1993. By providing the information pursuant to the Supreme Court's Order, Southern Bell does not intend to waive the attorney-client privilege or work product protection and reserves the right to assert the attorney-client privilege and work product protection if this information is requested by any other person including, but not limited to, requests that may be made in pending or future litigation, administrative proceedings or any other action or proceeding.

Southern Bell reserves the right to refute or contest certain of the information, beliefs, claims and conclusions that previously have been offered by the persons identified in this response to Items 1 through 10, or which they may offer in the future.

I. Subject Matter About Which Persons Identified  
Below May Have Responsive Information:  
Backing Up Clearing Times

23 NAME:  
24 TITLE:  
25 DATE OF EMPLOYMENT:  
26 BUSINESS ADDRESS:  
27 BUSINESS TELEPHONE:

28 NAME:  
29 TITLE:  
30 DATE OF EMPLOYMENT:  
31 BUSINESS ADDRESS:  
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1 NAME:  
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24 BUSINESS ADDRESS: ?  
25 BUSINESS TELEPHONE:

26 NAME: ;  
27 TITLE:  
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10 BUSINESS TELEPHONE:

11 NAME:  
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15 BUSINESS TELEPHONE:

16 NAME: J  
17 TITLE:  
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19 BUSINESS ADDRESS:  
20 BUSINESS TELEPHONE:

21 NAME:  
22 TITLE:  
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24 BUSINESS ADDRESS: J  
25 BUSINESS TELEPHONE:

26 NAME:  
27 TITLE:  
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29 BUSINESS ADDRESS:  
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31 NAME: J  
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34 BUSINESS ADDRESS:  
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1 NAME:  
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11 NAME: J  
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16 NAME: J  
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26 NAME:  
27 TITLE:  
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29 BUSINESS ADDRESS:  
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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
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6 NAME:  
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10 BUSINESS TELEPHONE:

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16 NAME:  
17 TITLE:  
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19 BUSINESS ADDRESS:  
20 BUSINESS TELEPHONE:

21 NAME:  
22 TITLE:  
23 DATE OF EMPLOYMENT:  
24 BUSINESS ADDRESS:  
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26 NAME:  
27 TITLE:  
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29 BUSINESS ADDRESS:  
30 BUSINESS TELEPHONE:



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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
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16 NAME:  
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26 NAME:  
27 TITLE:  
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29 BUSINESS ADDRESS:  
30 BUSINESS TELEPHONE:

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 NAME: Wanda F. Payne  
7 TITLE: Maintenance  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

11 NAME: Therell O. Rob  
12 TITLE: Services Tec  
13 DATE OF EMPLOYMENT:  
14 BUSINESS ADDRESS:  
15 BUSINESS TELEPHONE:

16 NAME: Fred Sauer  
17 TITLE: Services  
18 DATE OF EMPLOYMENT:  
19 BUSINESS ADDRESS:  
20 BUSINESS TELEPHONE:

21 NAME: James Stevens  
22 TITLE: Facility Te  
23 DATE OF EMPLOYMENT:  
24 BUSINESS ADDRESS:  
25 BUSINESS TELEPHONE:

26 NAME:  
27 TITLE:  
28 DATE OF EMPLOYMENT:  
29 BUSINESS ADDRESS:  
30 BUSINESS TELEPHONE:

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1 NAME:  
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14 BUSINESS ADDRESS:  
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16 NAME: R'  
17 TITLE:  
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19 BUSINESS ADDRESS:  
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26 NAME:  
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30 BUSINESS TELEPHONE:

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1 NAME:  
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4 BUSINESS ADDRESS:  
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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
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6 NAME: J  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
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11 NAME:  
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35 BUSINESS TELEPHONE

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1 NAME:  
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30 BUSINESS ADDRESS:  
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1 NAME:  
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4 BUSINESS ADDRESS:  
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6 NAME:  
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21 NAME:  
22 TITLE:  
23 DATE OF EMPLOYMENT:  
24 BUSINESS ADDRESS:  
25 BUSINESS TELEPHONE:

26 II. Subject Matter About Which Persons Identified  
27 Below May Have Responsive Information:  
28 Instructions To Back Up Clearing Times

29 NAME:  
30 TITLE:  
31 DATE OF EMPLOYMENT:  
32 BUSINESS ADDRESS:  
33 BUSINESS TELEPHONE:

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1 NAME:  
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3 DATE OF EMPLOYMENT:  
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29 BUSINESS ADDRESS:  
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1 NAME:  
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1 NAME:  
2 TITLE:  
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21 NAME:  
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30 BUSINESS TELEPHONE:

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1 NAME: )  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS: :  
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6 NAME:  
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10 BUSINESS TELEPHONE:

11 NAME:  
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14 BUSINESS ADDRESS:  
15 TELEPHONE: (704)

16 NAME:  
17 TITLE:  
18 DATE OF EMPLOYMENT:  
19 BUSINESS ADDRESS:  
20 BUSINESS TELEPHONE:

21 III. Subject Matter About Which Persons Identified  
22 Below May Have Responsive Information:  
23 Instructions To Back Up Clearing Times on Special Services

24 NAME:  
25 TITLE:  
26 DATE OF EMPLOYMENT:  
27 BUSINESS ADDRESS:  
28 BUSINESS TELEPHONE:

29 NAME: :  
30 TITLE:  
31 DATE OF EMPLOYMENT:  
32 BUSINESS ADDRESS:  
33 BUSINESS TELEPHONE:

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 IV. Subject Matter About Which Persons Identified  
7 Below May Have Responsive Information:  
8 Backing Up Clearing Times on OOS Troubles, which  
9 Were Believed Not To Have Been Properly Stated OOS

10 NAME:  
11 TITLE:  
12 DATE OF EMPLOYMENT:  
13 BUSINESS ADDRESS:  
14 BUSINESS TELEPHONE:

15 NAME:  
16 TITLE:  
17 DATE OF EMPLOYMENT:  
18 BUSINESS ADDRESS:  
19 BUSINESS TELEPHONE:

20 INFORMATION PROVIDED BY: Stephen M. Klimacek, Esq.  
21 150 West Flagler Street, Ste. 1910  
22 Miami, Florida 33130

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REQUEST: Please state the exact names, home addresses and phone numbers, and business addresses and phone numbers of all persons known by you who have any knowledge about falsifying commitment times on repair service forms, reports, or records.

RESPONSE: The following individuals may have information responsive to this interrogatory.

The information contained in the enclosed Responses is being provided pursuant to Order of the Florida Supreme Court dated February 4, 1993. By providing the information pursuant to the Supreme Court's Order, Southern Bell does not intend to waive the attorney-client privilege or work product protection and reserves the right to assert the attorney-client privilege and work product protection if this information is requested by any other person including, but not limited to, requests that may be made in pending or future litigation, administrative proceedings or any other action or proceeding.

Southern Bell reserves the right to refute or contest certain of the information, beliefs, claims and conclusions that previously have been offered by the persons identified in this response, or which they may offer in the future.

I. Subject Matter About Which Persons Identified  
Below May Have Responsive Information:  
Backing Up Clearing Times

24 NAME:  
25 TITLE:  
26 DATE OF EMPLOYMENT:  
27 BUSINESS ADDRESS:  
28 BUSINESS TELEPHONE:

29 NAME:  
30 TITLE:  
31 DATE OF EMPLOYMENT:  
32 BUSINESS ADDRESS:  
33 BUSINESS TELEPHONE:

34 NAME:

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II. Subject Matter About Which Persons Identified  
Below May Have Responsive Information:  
Instructions To Back Up Clearing Times

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1 NAME:  
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11 III. Subject Matter About Which Persons Identified  
12 Below May Have Responsive Information: Other

13 NAME:  
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16 BUSINESS ADDRESS:  
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INFORMATION PROVIDED BY: Stephen M. Klimacek, Esq.  
150 West Flagler Street, Ste. 1910  
Miami, Florida 33130

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REQUEST: Please state the exact names, home addresses and phone numbers, and business addresses and phone numbers of all persons known by you who have any knowledge about recording out-of-service reports as affecting service on repair service forms, reports, or records.

RESPONSE: The following individuals may have information responsive to this interrogatory.

The information contained in the enclosed Responses is being provided pursuant to Order of the Florida Supreme Court dated February 4, 1993. By providing the information pursuant to the Supreme Court's Order, Southern Bell does not intend to waive the attorney-client privilege or work product protection and reserves the right to assert the attorney-client privilege and work product protection if this information is requested by any other person including, but not limited to, requests that may be made in pending or future litigation, administrative proceedings or any other action or proceeding.

Southern Bell reserves the right to refute or contest certain of the information, beliefs, claims and conclusions that previously have been offered by the persons identified in this response, or which they may offer in the future.

I. Subject Matter About Which Persons Identified  
Below May Have Responsive Information:  
Not Statusing OOS

25 NAME:  
26 TITLE:  
27 DATE OF EMPLOYMENT:  
28 BUSINESS ADDRESS:  
29 BUSINESS TELEPHONE:

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21 II. Subject Matter About Which Persons Identified  
22 Below May Have Responsive Information:  
23 Instructions Not To Status OOS.

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21 III. Subject Matter About Which Persons Identified  
22 Below May Have Responsive Information:  
23 Certain Circumstances Under Which Troubles  
24 Normally Stated OOS Were Not Stated OOS

25 NAME:  
26 TITLE:  
27 DATE OF EMPLOYMENT:  
28 BUSINESS ADDRESS:  
29 32601  
30 BUSINESS TELEPHONE:

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IV. Subject Matter About Which Persons Identified  
Below May Have Responsive Information: Other

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 NAME:  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

11 NAME:  
12 TITLE:  
13 DATE OF EMPLOYMENT:  
14 BUSINESS ADDRESS:  
15 BUSINESS TELEPHONE:

16 NAME:  
17 TITLE:  
18 DATE OF EMPLOYMENT:  
19 BUSINESS ADDRESS:  
20 BUSINESS TELEPHONE:

21 NAME:  
22 TITLE:  
23 DATE OF EMPLOYMENT:  
24 BUSINESS ADDRESS:  
25 BUSINESS TELEPHONE:

26  
27  
28 INFORMATION PROVIDED BY: Stephen M. Klimacek, Esq.  
29 150 West Flagler Street, Ste. 1910  
30 Miami, Florida 33130

Southern Bell Telephone and Telegraph Company  
FPSC Docket No. 910163-TL  
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REQUEST: Please state the exact names, home addresses and phone numbers, and business addresses and phone numbers of all persons known by you who have any knowledge about recording or reporting on repair service forms, reports, or records that an extension of time for repairs was granted by a customer when the customer was not contacted.

RESPONSE: The following individuals may have information responsive to this interrogatory.

The information contained in the enclosed Responses is being provided pursuant to Order of the Florida Supreme Court dated February 4, 1993. By providing the information pursuant to the Supreme Court's Order, Southern Bell does not intend to waive the attorney-client privilege or work product protection and reserves the right to assert the attorney-client privilege and work product protection if this information is requested by any other person including, but not limited to, requests that may be made in pending or future litigation, administrative proceedings or any other action or proceeding.

Southern Bell reserves the right to refute or contest certain of the information, beliefs, claims and conclusions that previously have been offered by the persons identified in this response, or which they may offer in the future.

I. Subject Matter About Which Persons Identified  
Below May Have Responsive Information:  
PSC 222 Code Was Used Without First Speaking with Customer

26  
27  
28  
29  
30  
NAME:  
TITLE:  
DATE OF EMPLOYMENT:  
BUSINESS ADDRESS:  
BUSINESS TELEPHONE:

31  
32  
33  
34  
35  
NAME:  
TITLE:  
DATE OF EMPLOYMENT:  
BUSINESS ADDRESS:  
BUSINESS TELEPHONE:

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1 NAME:  
 2 TITLE:  
 3 DATE OF EMPLOYMENT:  
 4 BUSINESS ADDRESS:  
 5 BUSINESS TELEPHONE:

6 NAME:  
 7 TITLE:  
 8 DATE OF EMPLOYMENT:  
 9 BUSINESS ADDRESS:  
 10 BUSINESS TELEPHONE:

11 NAME:  
 12 TITLE:  
 13 DATE OF EMPLOYMENT:  
 14 BUSINESS ADDRESS:  
 15 BUSINESS TELEPHONE:

16 NAME:  
 17 TITLE:  
 18 DATE OF EMPLOYMENT:  
 19 BUSINESS ADDRESS:  
 20 BUSINESS TELEPHONE:

21 NAME:  
 22 TITLE:  
 23 DATE OF EMPLOYMENT:  
 24 BUSINESS ADDRESS:  
 25 BUSINESS TELEPHONE:

26 NAME:  
 27 TITLE:  
 28 DATE OF EMPLOYMENT:  
 29 BUSINESS ADDRESS:  
 30 BUSINESS TELEPHONE:

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 NAME:  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

(11 II. Subject Matter About Which Persons Identified  
12 Below May Have Responsive Information:  
13 Alleged Improper Use of CON Procedure

14 NAME:  
15 TITLE:  
16 DATE OF EMPLOYMENT:  
17 BUSINESS ADDRESS:  
18 BUSINESS TELEPHONE:

19 NAME:  
20 TITLE:  
21 DATE OF EMPLOYMENT:  
22 BUSINESS ADDRESS:  
23 BUSINESS TELEPHONE:

24 NAME:  
25 TITLE:  
26 DATE OF EMPLOYMENT:  
27 BUSINESS ADDRESS:  
28 BUSINESS TELEPHONE:

29 NAME:  
30 TITLE:  
31 DATE OF EMPLOYMENT:  
32 BUSINESS ADDRESS:  
33 BUSINESS TELEPHONE:

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 NAME:  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

11 NAME:  
12 TITLE:  
13 DATE OF EMPLOYMENT:  
14 BUSINESS ADDRESS:  
15 BUSINESS TELEPHONE:

16 NAME:  
17 TITLE:  
18 DATE OF EMPLOYMENT:  
19 BUSINESS ADDRESS:  
20 BUSINESS TELEPHONE:

21 NAME:  
22 TITLE:  
23 DATE OF EMPLOYMENT:  
24 BUSINESS ADDRESS:  
25 BUSINESS TELEPHONE:

26 NAME:  
27 TITLE:  
28 DATE OF EMPLOYMENT:  
29 BUSINESS ADDRESS:  
30 BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company  
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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 NAME:  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

11 NAME:  
12 TITLE:  
13 DATE OF EMPLOYMENT:  
14 BUSINESS ADDRESS:  
15 BUSINESS TELEPHONE:

16 NAME:  
17 TITLE:  
18 DATE OF EMPLOYMENT:  
19 BUSINESS ADDRESS:  
20 BUSINESS TELEPHONE:

21 NAME:  
22 TITLE:  
23 DATE OF EMPLOYMENT:  
24 BUSINESS ADDRESS:  
25 BUSINESS TELEPHONE:

26 III. Subject Matter About Which Persons Identified  
27 Below May Have Responsive Information:  
28 Commitment Times Changed without Customer's Knowledge

29 NAME:  
30 TITLE:  
31 DATE OF EMPLOYMENT:  
32 BUSINESS ADDRESS:  
33 BUSINESS TELEPHONE:

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1 IV. Subject Matter About Which Persons Identified  
2 Below May Have Responsive Information:  
3 Instructions To Change Repair Due Date and  
4 Time without Contacting Customer

5 NAME:  
6 TITLE:  
7 DATE OF EMPLOYMENT:  
8 BUSINESS ADDRESS:  
9 BUSINESS TELEPHONE:

INFORMATION PROVIDED BY: Stephen M. Klimacek, Esq.  
150 West Flagler Street, Ste. 1910  
Miami, Florida 33130

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Southern Bell Telephone and Telegraph Company  
FPSC Docket No. 910163-TL  
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REQUEST: Please state the exact names, home addresses and phone numbers, and business addresses and phone numbers of all persons known by you who have any knowledge about reporting access denied by a customer, when access was not denied, on repair service forms, reports, or records.

RESPONSE: The following individuals may have information responsive to this interrogatory.

The information contained in the enclosed Responses is being provided pursuant to Order of the Florida Supreme Court dated February 4, 1993. By providing the information pursuant to the Supreme Court's Order, Southern Bell does not intend to waive the attorney-client privilege or work product protection and reserves the right to assert the attorney-client privilege and work product protection if this information is requested by any other person including, but not limited to, requests that may be made in pending or future litigation, administrative proceedings or any other action or proceeding.

Southern Bell reserves the right to refute or contest certain of the information, beliefs, claims and conclusions that previously have been offered by the persons identified in this response, or which they may offer in the future.

I. Subject Matter About Which Persons Identified  
Below May Have Responsive Information:  
Closing Out Report as No Access When No One Was Dispatched

25 NAME:  
26 TITLE:  
27 DATE OF EMPLOYMENT:  
28 BUSINESS ADDRESS:  
29 BUSINESS TELEPHONE:

30 NAME:  
31 TITLE:  
32 DATE OF EMPLOYMENT:  
33 BUSINESS ADDRESS:  
34 BUSINESS TELEPHONE:

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1  
2  
3  
II. Subject Matter About Which Persons Identified  
Below May Have Responsive Information:  
Alleged Improper Use of No Access

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5  
6  
7  
8  
NAME:  
TITLE:  
DATE OF EMPLOYMENT:  
BUSINESS ADDRESS:  
BUSINESS TELEPHONE:

9  
10  
11  
12  
13  
NAME:  
TITLE:  
DATE OF EMPLOYMENT:  
BUSINESS ADDRESS: :  
BUSINESS TELEPHONE:

30

INFORMATION PROVIDED BY: Stephen M. Klimacek, Esq.  
150 West Flagler Street, Ste. 1910  
Miami, Florida 33130

Southern Bell Telephone and Telegraph Company  
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REQUEST: Please state the exact names, home addresses and phone numbers, and business addresses and phone numbers of all persons known by you who have any knowledge about the use of recording improper exclusion codes on repair service forms, reports, or records.

RESPONSE: The following individuals may have information responsive to this interrogatory.

The information contained in the enclosed Responses is being provided pursuant to Order of the Florida Supreme Court dated February 4, 1993. By providing the information pursuant to the Supreme Court's Order, Southern Bell does not intend to waive the attorney-client privilege or work product protection and reserves the right to assert the attorney-client privilege and work product protection if this information is requested by any other person including, but not limited to, requests that may be made in pending or future litigation, administrative proceedings or any other action or proceeding.

Southern Bell reserves the right to refute or contest certain of the information, beliefs, claims and conclusions that previously have been offered by the persons identified in this response, or which they may offer in the future.

I. Subject Matter About Which Persons Identified  
Below May Have Responsive Information:  
Alleged Improper Use of Exclude Codes

25 NAME:  
26 TITLE:  
27 DATE OF EMPLOYMENT:  
28 BUSINESS ADDRESS:  
29 BUSINESS TELEPHONE:

30 NAME:  
31 TITLE:  
32 DATE OF EMPLOYMENT:  
33 BUSINESS ADDRESS:  
34 BUSINESS TELEPHONE:

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 NAME:  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

11 NAME:  
12 TITLE:  
13 DATE OF EMPLOYMENT:  
14 BUSINESS ADDRESS:  
15 BUSINESS TELEPHONE:

16 NAME:  
17 TITLE:  
18 DATE OF EMPLOYMENT:  
19 BUSINESS ADDRESS:  
20 BUSINESS TELEPHONE:

21 NAME:  
22 TITLE:  
23 DATE OF EMPLOYMENT:  
24 BUSINESS ADDRESS:  
25 BUSINESS TELEPHONE:

26 NAME:  
27 TITLE:  
28 DATE OF EMPLOYMENT:  
29 BUSINESS ADDRESS:  
30 BUSINESS TELEPHONE:

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS: ;  
5 BUSINESS TELEPHONE:

6 NAME:  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

11 NAME:  
12 TITLE:  
13 DATE OF EMPLOYMENT:  
14 BUSINESS ADDRESS:  
15 BUSINESS TELEPHONE:

16 NAME:  
17 TITLE:  
18 DATE OF EMPLOYMENT:  
19 BUSINESS ADDRESS: ;  
20 BUSINESS TELEPHONE:

21 NAME:  
22 TITLE:  
23 DATE OF EMPLOYMENT:  
24 BUSINESS ADDRESS:  
25 BUSINESS TELEPHONE:

26 NAME:  
27 TITLE:  
28 DATE OF EMPLOYMENT:  
29 BUSINESS ADDRESS:  
30 BUSINESS TELEPHONE:

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 NAME:  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

11 NAME:  
12 TITLE:  
13 DATE OF EMPLOYMENT:  
14 BUSINESS ADDRESS:  
15 BUSINESS TELEPHONE:

16 NAME:  
17 TITLE:  
18 DATE OF EMPLOYMENT:  
19 BUSINESS ADDRESS:  
20 BUSINESS TELEPHONE:

21 NAME:  
22 TITLE:  
23 DATE OF EMPLOYMENT:  
24 BUSINESS ADDRESS:  
25 BUSINESS TELEPHONE:

26 NAME:  
27 TITLE:  
28 DATE OF EMPLOYMENT:  
29 BUSINESS ADDRESS:  
30 BUSINESS TELEPHONE:



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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 NAME:  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

11 NAME:  
12 TITLE:  
13 DATE OF EMPLOYMENT:  
14 BUSINESS ADDRESS:  
15 BUSINESS TELEPHONE:

16 NAME:  
17 TITLE:  
18 DATE OF EMPLOYMENT:  
19 BUSINESS ADDRESS:  
20 BUSINESS TELEPHONE:

21 NAME:  
22 TITLE:  
23 DATE OF EMPLOYMENT:  
24 BUSINESS ADDRESS:  
25 BUSINESS TELEPHONE:

26 NAME:  
27 TITLE:  
28 DATE OF EMPLOYMENT:  
29 BUSINESS ADDRESS:  
30 BUSINESS TELEPHONE:

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 NAME:  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

11 NAME:  
12 TITLE:  
13 DATE OF EMPLOYMENT:  
14 BUSINESS ADDRESS:  
15 BUSINESS TELEPHONE:

16 NAME:  
17 TITLE:  
18 DATE OF EMPLOYMENT:  
19 BUSINESS ADDRESS:  
20 BUSINESS TELEPHONE:

21 NAME:  
22 TITLE:  
23 DATE OF EMPLOYMENT:  
24 BUSINESS ADDRESS:  
25 BUSINESS TELEPHONE:

26 NAME:  
27 TITLE:  
28 DATE OF EMPLOYMENT:  
29 BUSINESS ADDRESS:  
30 BUSINESS TELEPHONE:

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 NAME:  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

11 II. Subject Matter About Which Persons Identified  
12 Below May Have Responsive Information:  
13 Alleged Instructions to Use Exclude Codes Improperly

14 NAME:  
15 TITLE:  
16 DATE OF EMPLOYMENT:  
17 BUSINESS ADDRESS:  
18 BUSINESS TELEPHONE:

19 NAME:  
20 TITLE:  
21 DATE OF EMPLOYMENT:  
22 BUSINESS ADDRESS:  
23 BUSINESS TELEPHONE:

24 NAME:  
25 TITLE:  
26 DATE OF EMPLOYMENT:  
27 BUSINESS ADDRESS:  
28 BUSINESS TELEPHONE:

29 NAME:  
30 TITLE:  
31 DATE OF EMPLOYMENT:  
32 BUSINESS ADDRESS:  
33 BUSINESS TELEPHONE:

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 NAME:  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

11 NAME:  
12 TITLE:  
13 DATE OF EMPLOYMENT:  
14 BUSINESS ADDRESS:  
15 BUSINESS TELEPHONE:

16 NAME:  
17 TITLE:  
18 DATE OF EMPLOYMENT:  
19 BUSINESS ADDRESS:  
20 BUSINESS TELEPHONE:

21 NAME:  
22 TITLE:  
23 DATE OF EMPLOYMENT:  
24 BUSINESS ADDRESS:  
25 BUSINESS TELEPHONE:

26 NAME:  
27 TITLE:  
28 DATE OF EMPLOYMENT:  
29 BUSINESS ADDRESS:  
30 BUSINESS TELEPHONE:

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 NAME:  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

11 NAME:  
12 TITLE:  
13 DATE OF EMPLOYMENT:  
14 BUSINESS ADDRESS:  
15 BUSINESS TELEPHONE:

16 NAME:  
17 TITLE:  
18 DATE OF EMPLOYMENT:  
19 BUSINESS ADDRESS:  
20 BUSINESS TELEPHONE:

21 NAME:  
22 TITLE:  
23 DATE OF EMPLOYMENT:  
24 BUSINESS ADDRESS:  
25 BUSINESS TELEPHONE:

26 NAME:  
27 TITLE:  
28 DATE OF EMPLOYMENT:  
29 BUSINESS ADDRESS:  
30 BUSINESS TELEPHONE:

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 NAME:  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

11 NAME:  
12 TITLE:  
13 DATE OF EMPLOYMENT:  
14 BUSINESS ADDRESS:  
15 BUSINESS TELEPHONE:

16 NAME:  
17 TITLE:  
18 DATE OF EMPLOYMENT:  
19 BUSINESS ADDRESS:  
20 BUSINESS TELEPHONE:

21 NAME:  
22 TITLE:  
23 DATE OF EMPLOYMENT:  
24 BUSINESS ADDRESS:  
25 BUSINESS TELEPHONE:

26 NAME:  
27 TITLE:  
28 DATE OF EMPLOYMENT:  
29 BUSINESS ADDRESS:  
30 BUSINESS TELEPHONE:

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 III. Subject Matter About Which Persons Identified  
7 Below May Have Responsive Information: Other

8 NAME:  
9 TITLE:  
10 DATE OF EMPLOYMENT:  
11 BUSINESS ADDRESS:  
12 BUSINESS TELEPHONE:

INFORMATION PROVIDED BY: Stephen M. Klimacek, Esq.  
150 West Flagler Street, Ste. 1910  
Miami, Florida 33130

Southern Bell Telephone and Telegraph Company  
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REQUEST: Please state the exact names, home addresses and phone numbers, and business addresses and phone numbers of all persons known by you who have any knowledge about changing "test OK" repair service forms, reports or records to "out-of-service" repair forms, reports, or records.

RESPONSE: The following individuals may have information responsive to this interrogatory.

The information contained in the enclosed Responses is being provided pursuant to Order of the Florida Supreme Court dated February 4, 1993. By providing the information pursuant to the Supreme Court's Order, Southern Bell does not intend to waive the attorney-client privilege or work product protection and reserves the right to assert the attorney-client privilege and work product protection if this information is requested by any other person including, but not limited to, requests that may be made in pending or future litigation, administrative proceedings or any other action or proceeding.

Southern Bell reserves the right to refute or contest certain of the information, beliefs, claims and conclusions that previously have been offered by the persons identified in this response, or which they may offer in the future.

I. Subject Matter About Which Persons Identified  
Below May Have Responsive Information:  
Statusing Test-OKs as OOS

25 NAME:  
26 TITLE:  
27 DATE OF EMPLOYMENT:  
28 BUSINESS ADDRESS:  
29 BUSINESS TELEPHONE:

30 NAME:  
31 TITLE:  
32 DATE OF EMPLOYMENT:  
33 BUSINESS ADDRESS:  
34 BUSINESS TELEPHONE:

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 NAME:  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

11 NAME:  
12 TITLE:  
13 DATE OF EMPLOYMENT:  
14 BUSINESS ADDRESS:  
15 BUSINESS TELEPHONE:

16 NAME:  
17 TITLE:  
18 DATE OF EMPLOYMENT:  
19 BUSINESS ADDRESS:  
20 BUSINESS TELEPHONE:

21 NAME:  
22 TITLE:  
23 DATE OF EMPLOYMENT:  
24 BUSINESS ADDRESS:  
25 BUSINESS TELEPHONE:

26 NAME:  
27 TITLE:  
28 DATE OF EMPLOYMENT:  
29 BUSINESS ADDRESS:  
30 BUSINESS TELEPHONE:

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 NAME:  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

11 NAME:  
12 TITLE:  
13 DATE OF EMPLOYMENT:  
14 BUSINESS ADDRESS:  
15 BUSINESS TELEPHONE:

16 NAME:  
17 TITLE:  
18 DATE OF EMPLOYMENT:  
19 BUSINESS ADDRESS:  
20 BUSINESS TELEPHONE:

21 NAME:  
22 TITLE:  
23 DATE OF EMPLOYMENT:  
24 BUSINESS ADDRESS:  
25 BUSINESS TELEPHONE:

26 NAME:  
27 TITLE:  
28 DATE OF EMPLOYMENT:  
29 BUSINESS ADDRESS:  
30 BUSINESS TELEPHONE:

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 NAME:  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

11 NAME:  
12 TITLE:  
13 DATE OF EMPLOYMENT:  
14 BUSINESS ADDRESS:  
15 BUSINESS TELEPHONE:

16 NAME:  
17 TITLE:  
18 DATE OF EMPLOYMENT:  
19 BUSINESS ADDRESS:  
20 BUSINESS TELEPHONE:

21 NAME:  
22 TITLE:  
23 DATE OF EMPLOYMENT:  
24 BUSINESS ADDRESS:  
25 BUSINESS TELEPHONE:

26 NAME:  
27 TITLE:  
28 DATE OF EMPLOYMENT:  
29 BUSINESS ADDRESS:  
30 BUSINESS TELEPHONE:

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 NAME:  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

11 II. Subject Matter About Which Persons Identified  
12 Below May Have Responsive Information: Other

13 NAME:  
14 TITLE:  
15 DATE OF EMPLOYMENT:  
16 BUSINESS ADDRESS:  
17 BUSINESS TELEPHONE:

18 NAME:  
19 TITLE:  
20 DATE OF EMPLOYMENT:  
21 BUSINESS ADDRESS:  
22 BUSINESS TELEPHONE:

INFORMATION PROVIDED BY: Stephen M. Klimacek, Esq.  
150 West Flagler Street, Ste. 1910  
Miami, Florida 33130

REQUEST: Please state the exact names, home addresses and phone numbers, and business addresses and phone numbers of all persons known by you who have any knowledge about subscriber repair reports recorded or reported as employee repair reports on repair service forms, reports, or records.

RESPONSE: The following individuals may have information responsive to this interrogatory.

The information contained in the enclosed Responses is being provided pursuant to Order of the Florida Supreme Court dated February 4, 1993. By providing the information pursuant to the Supreme Court's Order, Southern Bell does not intend to waive the attorney-client privilege or work product protection and reserves the right to assert the attorney-client privilege and work product protection if this information is requested by any other person including, but not limited to, requests that may be made in pending or future litigation, administrative proceedings or any other action or proceeding.

Southern Bell reserves the right to refute or contest certain of the information, beliefs, claims and conclusions that previously have been offered by the persons identified in this response, or which they may offer in the future.

I. Subject Matter About Which Persons Identified  
Below May Have Responsive Information:  
Creation of Employee Originated Reports for Customers  
Who Called or Were Called Concerning Repeat Problems

26 NAME:  
27 TITLE:  
28 DATE OF EMPLOYMENT:  
29 BUSINESS ADDRESS:  
30 BUSINESS TELEPHONE:

31 NAME:  
32 TITLE:  
33 DATE OF EMPLOYMENT:  
34 BUSINESS ADDRESS:  
35

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1 BUSINESS TELEPHONE:

2 NAME:  
3 TITLE:  
4 DATE OF EMPLOYMENT:  
5 BUSINESS ADDRESS:  
6 BUSINESS TELEPHONE:

7 NAME:  
8 TITLE:  
9 DATE OF EMPLOYMENT:  
10 BUSINESS ADDRESS:  
11 BUSINESS TELEPHONE:

12 NAME:  
13 TITLE:  
14 DATE OF EMPLOYMENT:  
15 BUSINESS ADDRESS:  
16 BUSINESS TELEPHONE:

17 NAME:  
18 TITLE:  
19 DATE OF EMPLOYMENT:  
20 BUSINESS ADDRESS:  
21 BUSINESS TELEPHONE:

22 NAME:  
23 TITLE:  
24 DATE OF EMPLOYMENT:  
25 BUSINESS ADDRESS:  
26 BUSINESS TELEPHONE:

27 NAME:  
28 TITLE:  
29 DATE OF EMPLOYMENT:  
30 BUSINESS ADDRESS:  
31 BUSINESS TELEPHONE:

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 NAME:  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

11 NAME:  
12 TITLE:  
13 DATE OF EMPLOYMENT:  
14 BUSINESS ADDRESS:  
15 BUSINESS TELEPHONE:

16 NAME:  
17 TITLE:  
18 DATE OF EMPLOYMENT:  
19 BUSINESS ADDRESS:  
20 BUSINESS TELEPHONE:

21 NAME:  
22 TITLE:  
23 DATE OF EMPLOYMENT:  
24 BUSINESS ADDRESS:  
25 BUSINESS TELEPHONE:

26 II. Subject Matter About Which Persons Identified  
27 Below May Have Responsive Information:  
28 Customer Direct Reports Reported  
29 as Employee Originated Reports

30 NAME:  
31 TITLE:  
32 DATE OF EMPLOYMENT:  
33 BUSINESS ADDRESS:  
34 BUSINESS TELEPHONE:

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 NAME:  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

11 NAME:  
12 TITLE:  
13 DATE OF EMPLOYMENT:  
14 BUSINESS ADDRESS:  
15 BUSINESS TELEPHONE:

16 NAME:  
17 TITLE:  
18 DATE OF EMPLOYMENT:  
19 BUSINESS ADDRESS:  
20 BUSINESS TELEPHONE:

INFORMATION PROVIDED BY: Stephen M. Klimacek, Esq.  
150 West Flagler Street, Ste. 1910  
Miami, Florida 33130



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REQUEST: Please state the exact names, home addresses and phone numbers, and business addresses and phone numbers of all persons known by you who have any knowledge about fictitious repair service forms, reports, or records.

RESPONSE: The following individuals may have information responsive to this interrogatory.

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I. Subject Matter About Which Persons Identified  
Below May Have Responsive Information:  
Creation of Cable Failure

24 NAME:  
25 TITLE:  
26 DATE OF EMPLOYMENT:  
27 BUSINESS ADDRESS:  
28 BUSINESS TELEPHONE:

29 NAME:  
30 TITLE:  
31 DATE OF EMPLOYMENT:  
32 BUSINESS ADDRESS:  
33 BUSINESS TELEPHONE:

II. Subject Matter About Which Persons Identified  
Below May Have Responsive Information:  
Alleged Creation of Fictitious Trouble Reports

4 NAME:  
5 TITLE:  
6 DATE OF EMPLOYMENT:  
7 BUSINESS ADDRESS: 4  
8 BUSINESS TELEPHONE:

9 NAME:  
10 TITLE:  
11 DATE OF EMPLOYMENT:  
12 BUSINESS ADDRESS:  
13 BUSINESS TELEPHONE:

14 NAME:  
15 TITLE:  
16 DATE OF EMPLOYMENT:  
17 BUSINESS ADDRESS: 9  
18 BUSINESS TELEPHONE:

19 NAME:  
20 TITLE:  
21 DATE OF EMPLOYMENT:  
22 BUSINESS ADDRESS:  
23 BUSINESS TELEPHONE:

24 NAME:  
25 TITLE:  
26 DATE OF EMPLOYMENT:  
27 BUSINESS ADDRESS:  
28 BUSINESS TELEPHONE:

29 NAME:  
30 TITLE:  
31 DATE OF EMPLOYMENT:  
32 BUSINESS ADDRESS:  
33 BUSINESS TELEPHONE:

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 NAME:  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

11 NAME:  
12 TITLE:  
13 DATE OF EMPLOYMENT:  
14 BUSINESS ADDRESS:  
15 BUSINESS TELEPHONE:

16 NAME:  
17 TITLE:  
18 DATE OF EMPLOYMENT:  
19 BUSINESS ADDRESS:  
20 BUSINESS TELEPHONE:

21 NAME:  
22 TITLE:  
23 DATE OF EMPLOYMENT:  
24 BUSINESS ADDRESS:  
25 BUSINESS TELEPHONE:

26 NAME:  
27 TITLE:  
28 DATE OF EMPLOYMENT:  
29 BUSINESS ADDRESS:  
30 BUSINESS TELEPHONE:

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 NAME:  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

11 NAME:  
12 TITLE:  
13 DATE OF EMPLOYMENT:  
14 BUSINESS ADDRESS:  
15 BUSINESS TELEPHONE:

16 III. Subject Matter About Which Persons Identified  
17 Below May Have Responsive Information:  
18 Alleged Fictitious Customer Direct Reports Shown Test-OKs

19 NAME:  
20 TITLE:  
21 DATE OF EMPLOYMENT:  
22 BUSINESS ADDRESS:  
23 BUSINESS TELEPHONE:

24 NAME:  
25 TITLE:  
26 DATE OF EMPLOYMENT:  
27 BUSINESS ADDRESS:  
28 BUSINESS TELEPHONE:

IV. Subject Matter About Which Persons Identified  
Below May Have Responsive Information:  
Alleged Instructions To Create Fictitious Trouble Reports

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS: 9  
5 BUSINESS TELEPHONE:

6 NAME:  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

11 V. Subject Matter About Which Persons Identified  
12 Below May Have Responsive Information: Other

13 NAME:  
14 TITLE:  
15 DATE OF EMPLOYMENT:  
16 BUSINESS ADDRESS:  
17 BUSINESS TELEPHONE:

INFORMATION PROVIDED BY: Stephen M. Klimacek, Esq.  
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REQUEST: Please state the exact names, home addresses and phone numbers, and business addresses and phone numbers of all persons known by you who have any knowledge about repair service forms, reports, or records that are fraudulent or knowingly false in any respect.

RESPONSE: The following individuals may have information responsive to this interrogatory.

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I. Subject Matter About Which Persons Identified  
Below May Have Responsive Information:  
Alleged Improper Exclusion of Trouble Reports

25 NAME:  
26 TITLE:  
27 DATE OF EMPLOYMENT:  
28 BUSINESS ADDRESS:  
29 BUSINESS TELEPHONE:

30 NAME:  
31 TITLE:  
32 DATE OF EMPLOYMENT:  
33 BUSINESS ADDRESS:  
34 BUSINESS TELEPHONE:

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 NAME:  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

11 NAME:  
12 TITLE:  
13 DATE OF EMPLOYMENT:  
14 BUSINESS ADDRESS:  
15 BUSINESS TELEPHONE:

16 NAME:  
17 TITLE:  
18 DATE OF EMPLOYMENT:  
19 BUSINESS ADDRESS:  
20 BUSINESS TELEPHONE:

21 NAME:  
22 TITLE:  
23 DATE OF EMPLOYMENT:  
24 BUSINESS ADDRESS:  
25 BUSINESS TELEPHONE:

26 NAME:  
27 TITLE:  
28 DATE OF EMPLOYMENT:  
29 BUSINESS ADDRESS:  
30 BUSINESS TELEPHONE:

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 NAME:  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

II. Subject Matter About Which Persons Identified Below  
May Have Responsive Information:  
Alleged Improper Status of OOS or  
Alleged Instructions To Status OOS Improperly

15 NAME:  
16 TITLE:  
17 DATE OF EMPLOYMENT:  
18 BUSINESS ADDRESS:  
19 BUSINESS TELEPHONE:

20 NAME:  
21 TITLE:  
22 DATE OF EMPLOYMENT:  
23 BUSINESS ADDRESS:  
24 BUSINESS TELEPHONE:

25 NAME:  
26 TITLE:  
27 DATE OF EMPLOYMENT:  
28 BUSINESS ADDRESS:  
29 BUSINESS TELEPHONE:

30 NAME:  
31 TITLE:  
32 DATE OF EMPLOYMENT:  
33 BUSINESS ADDRESS:  
34 BUSINESS TELEPHONE:



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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 NAME:  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

11 NAME:  
12 TITLE:  
13 DATE OF EMPLOYMENT:  
14 BUSINESS ADDRESS:  
15 BUSINESS TELEPHONE:

16 NAME:  
17 TITLE:  
18 DATE OF EMPLOYMENT:  
19 BUSINESS ADDRESS:  
20 BUSINESS TELEPHONE:

21 NAME:  
22 TITLE:  
23 DATE OF EMPLOYMENT:  
24 BUSINESS ADDRESS:  
25 BUSINESS TELEPHONE:

26 NAME:  
27 TITLE:  
28 DATE OF EMPLOYMENT:  
29 BUSINESS ADDRESS:  
30 BUSINESS TELEPHONE:

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 NAME:  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

11 NAME:  
12 TITLE:  
13 DATE OF EMPLOYMENT:  
14 BUSINESS ADDRESS: 9  
15 BUSINESS TELEPHONE:

16 NAME:  
17 TITLE:  
18 DATE OF EMPLOYMENT:  
19 BUSINESS ADDRESS:  
20 BUSINESS TELEPHONE:

21 NAME:  
22 TITLE:  
23 DATE OF EMPLOYMENT:  
24 BUSINESS ADDRESS:  
25 BUSINESS TELEPHONE:

III. Subject Matter About Which Persons Identified  
Below May Have Responsive Information:  
Troubles Cleared Prior to Dispatch

29 NAME:  
30 TITLE:  
31 DATE OF EMPLOYMENT:  
32 BUSINESS ADDRESS:  
33 BUSINESS TELEPHONE:

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 NAME:  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

IV. Subject Matter About Which Persons Identified Below  
May Have Responsive Information:  
Misuse of Employee Code

14 NAME:  
15 TITLE:  
16 DATE OF EMPLOYMENT:  
17 BUSINESS ADDRESS:  
18 BUSINESS TELEPHONE:

19 NAME:  
20 TITLE:  
21 DATE OF EMPLOYMENT:  
22 BUSINESS ADDRESS:  
23 BUSINESS TELEPHONE:

24 NAME:  
25 TITLE:  
26 DATE OF EMPLOYMENT:  
27 BUSINESS ADDRESS:  
28 BUSINESS TELEPHONE:

29 NAME:  
30 TITLE:  
31 DATE OF EMPLOYMENT:  
32 BUSINESS ADDRESS:  
33 BUSINESS TELEPHONE:

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 NAME:  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

11 NAME:  
12 TITLE:  
13 DATE OF EMPLOYMENT:  
14 BUSINESS ADDRESS:  
15 BUSINESS TELEPHONE:

16 NAME:  
17 TITLE:  
18 DATE OF EMPLOYMENT:  
19 BUSINESS ADDRESS:  
20 BUSINESS TELEPHONE:

21 NAME:  
22 TITLE:  
23 DATE OF EMPLOYMENT:  
24 BUSINESS ADDRESS:  
25 BUSINESS TELEPHONE:

V. Subject Matter About Which Persons Identified  
Below May Have Responsive Information:  
Central Office Failure Closed To Test-OK Code

29 NAME:  
30 TITLE:  
31 DATE OF EMPLOYMENT:  
32 BUSINESS ADDRESS:  
33 BUSINESS TELEPHONE:

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

VI. Subject Matter About Which Persons Identified  
Below May Have Responsive Information:  
Alleged Improper Use of CCA

9 NAME:  
10 TITLE:  
11 DATE OF EMPLOYMENT:  
12 BUSINESS ADDRESS:  
13 BUSINESS TELEPHONE:

14 NAME:  
15 TITLE:  
16 DATE OF EMPLOYMENT:  
17 BUSINESS ADDRESS:  
18 BUSINESS TELEPHONE:

VII. Subject Matter About Which Persons Identified  
Below May Have Responsive Information:  
Troubles Closed as Test-OK when Trouble Still Existed

22 NAME:  
23 TITLE:  
24 DATE OF EMPLOYMENT:  
25 BUSINESS ADDRESS:  
26 BUSINESS TELEPHONE:

27 NAME:  
28 TITLE:  
29 DATE OF EMPLOYMENT:  
30 BUSINESS ADDRESS:  
31 BUSINESS TELEPHONE:

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1 NAME:  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

6 NAME:  
7 TITLE:  
8 DATE OF EMPLOYMENT:  
9 BUSINESS ADDRESS:  
10 BUSINESS TELEPHONE:

VIII. Subject Matter About Which Persons Identified Below  
May Have Responsive Information: Other

13 NAME:  
14 TITLE:  
15 DATE OF EMPLOYMENT:  
16 BUSINESS ADDRESS:  
17 BUSINESS TELEPHONE:

18 NAME:  
19 TITLE:  
20 DATE OF EMPLOYMENT:  
21 BUSINESS ADDRESS:  
22 BUSINESS TELEPHONE:

23 NAME:  
24 TITLE:  
25 DATE OF EMPLOYMENT:  
26 BUSINESS ADDRESS:  
27 BUSINESS TELEPHONE:

28 NAME:  
29 TITLE:  
30 DATE OF EMPLOYMENT:  
31 BUSINESS ADDRESS:  
32 BUSINESS TELEPHONE:

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1 NAME: }  
2 TITLE:  
3 DATE OF EMPLOYMENT:  
4 BUSINESS ADDRESS:  
5 BUSINESS TELEPHONE:

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