Southern Bell Telephone and Telegraph Company Florida Public Service Commission Docket No. 910163 TL 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 \_ INFORMATON PROVIDED BY: R. H. Lee, Jr. Manager CAF Room 36M66 675 W. Peachtree Street, N.E. CMU Atlanta, GA 30375 ATTORNEY LEG LIN -OPC \_\_\_\_ RCH \_\_\_\_\_ SEC DOCUMENT NUMBER-DATE WAS \_\_\_\_\_ OTH \_\_\_\_ 04159 APR 168 FPSC-RECORDS/REPORTING FOJAÜJY 0000001

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.

INFORMATION PROVIDED BY:

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

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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 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 recording out-ofservice 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.

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

Manager Room 36M66 675 W. Peachtree Street, N.E. Atlanta, GA 30375

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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 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 ny knowledge about recording or reporting on repair service forms, reports, or records that an extension o 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.

INFORMATION PROVIDED BY:

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

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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.

INFORMATION PROVIDED BY:

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

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Harris R. Chithou

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.

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

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

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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. 7 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 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.

INFORMATION PROVIDED BY:

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

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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. 8 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 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.

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

Manager Room 36M66 675 W. Peachtree Street, N.E. Atlanta, GA 30375

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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. 9 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 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.

INFORMATION PROVIDED BY:

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

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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. 10 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 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.

INFORMATION PROVIDED BY:

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

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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.

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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. 11-1 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:

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

INFORMATION PROVIDED BY:

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

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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. 11-2 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

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

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

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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
- 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
- Memorandum to All Maintenance Administrators, Subject: OOS Troubles, undated, unsigned

INFORMATION PROVIDED BY:

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R. H. Lee, Jr., Manager 675 W. Peachtree Street, N.E. Atlanta, GA 30375

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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
- Memorandum "OOS Statusing", dated August 23, 1985, unsigned
- 7. Memorandum "All Maintenance Administrators", "Subject OOS Troubles", Dated November 8, 1985, unsigned

INFORMATION PROVIDED BY:

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R. H. Lee, Jr., Manager 675 W. Peachtree Street, N.E. Atlanta, GA 30375

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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. 11-4 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:

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

INFORMATION PROVIDED BY:

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

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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

INFORMATION PROVIDED BY:

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

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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. 11-6 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 L. E. Crittenden from N. D'Alessio, dated November 29, 1990
- 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

INFORMATION PROVIDED BY:

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

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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
- 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 Decmeber 26, 1990
- 6. Security Report, Title: Joseph A. Lesko and Nancy D'Alessio, dated October 30, 1990

INFORMATION PROVIDED BY: R

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

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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 2 of 2

**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

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

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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 unnecesary, 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

INFORMATION PROVIDED BY:

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

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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. 11-9 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 unnecesary, 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

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

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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 unnecesary, 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:

- 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

INFORMATION PROVIDED BY:

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

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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

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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

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

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

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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. 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

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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. 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

is L. Chithou

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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. 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

n. T. Chithou

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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. 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

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

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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. 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

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ATTACHMENT 1

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## INFORMATION REDACTED

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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. 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

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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. 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

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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. 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

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#### ATTACHMENT 1

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34 <b>481-4564</b> 35 36 37	

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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. 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

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#### ATTACHMENT II

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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. 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

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

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is R. anthony

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STATE OF GEORGIA COUNTY OF FULTON

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

That he occupies the position of <u>Manager, Headquarters Regulatory</u> and is the person who has furnished answer(s) to these interrogatory(ies) No. <u>1-21</u> 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	8th day of	July.
A.D.,	1991.			$\rho$	1.		

Sp. At. DM Salas Edeltrand M. S

Notary Public

state of Leoigna

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

Harris R. Anthony General Counsel-Florida

and services of a

Southern Beil 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,

AYUNUO K. UNU Harris R. Anthony

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  $\mathcal{A}_{t}$  day of  $\mathcal{G}_{t}$ . , 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. Melson 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

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

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

February 25, 1993

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

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:

- a TITLE:
- 25 DATE OF EMPLOYMENT:
- 26 BUSINESS ADDRESS:
- 27 BUSINESS TELEPHONE:
- 28 NAME:
- 24 TITLE:
- 30 DATE OF EMPLOYMENT:
- 31 BUSINESS ADDRESS:
- 31 BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 1 Page 2 of 25

NAME: 1

- TITLE: 2
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- ② DATE OF EMPLOYMENT:
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- 20 BUSINESS TELEPHONE:

21 NAME:

27 TITLE:

23 DATE OF EMPLOYMENT 24 BUSINESS ADDRESS:

- . BUSINESS TELEPHONE
- 21 27 NAME:
- TITLE:

23 DATE OF EMPLOYMENT: **HOLDERS ADDRESS:** 

BUSINESS TELEPHONE: 30

Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 1 Page 3 of 25

1 NAME:

- TITLE: DATE OF EMPLOYMENT:
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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 1 Page 4 of 25

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 1 Page 5 of 25

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 1 Page 6 of 25 NAME: 🐭 2 TITLE: 3 DATE OF EMPLOYMENT: 4 BUSINESS ADDRESS:  $\zeta$  BUSINESS TELEPHONE: b NAME: 1 TITLE: 00 DATE OF EMPLOYMEN'S BUSINESS ADDRESS: G D BUSINESS TELEPHONE: || NAME: 12 TITLE. 13 DATE OF EMPLOYMENT: **BUSINESS ADDRESS:** BUSINESS TELEPHONE: 16 NAME: () TITLE: ( DATE OF EMPLOYMENT: H BUSINESS ADDRESS: 30 BUSINESS TELEPHONE: 2 NAME: 22 TITLE: 23 DATE OF EMPLOYMENT: 24 BUSINESS ADDRESS: 25 BUSINESS TELEPHONE: 26 NAME: 21 TITLE: 24 DATE OF EMPLOYMENT: >- BUSINESS ADDRESS: 30 BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 1 Page 7 of 25

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- -----DATE OF EMPLOYMENT:
- 4 BUSINESS ADDRESS: ]
- BUSINESS TELEPHONE: 5

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9 BUSINESS ADDRESS:

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12 TITLE:

13 DATE OF EMPLOYMENT:

W BUSINESS ADDRESS:

15 BUSINESS TELEPHONE:

16 NAME: 7

7 TITLE:

13 DATE OF EMPLOYMENT:

H BUSINESS ADDRESS:

20 BUSINESS TELEPHONE:

21 NAME:

22 TITLE:

23 DATE OF EMPLOYMENT:

24 BUSINESS ADDRESS:

25 BUSINESS TELEPHONF

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2 § DATE OF EMPLOYMENT:

29 BUSINESS ADDRESS:

30 BUSINESS TELEPHONE:

Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 1 Page 8 of 25

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20 DATE OF EMPLOYMENT: 29 BUSINESS ADDRESS: 30 BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 1 Page 9 of 25 NAME: 1 TITLE: 2 DATE OF EMPLOYMENT: 3 BUSINESS ADDRESS: 4 BUSINESS TELEPHONE: \* 5 NAME: þ TITLE: 7 DATE OF EMPLOYMENT 8 BUSINESS ADDRESS: 9 BUSINESS TELEPHONE: 30 NAME: ) TITLE: 12 DATE OF EMPLOYMENT: 13 BUSINESS ADDRESS: 14 BUSINESS TELEPHONE: 15 NAME: 4 16 TITLE: 17 DATE OF EMPLOYMENT: <sup>19</sup> BUSINESS ADDRESS: BUSINESS TELEPHONE: 21 NAME: 22 TITLE: 23 DATE OF EMPLOYMENT: 24 BUSINESS ADDRESS: 25 BUSINESS TELEPHONE: 24 NAME: 27 TITLE: 29 DATE OF EMPLOYMENT: 29 BUSINESS ADDRESS:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 1 Page 10 of 25 NAME: 1 TITLE: 2 DATE OF EMPLOYMENT: 3 BUSINESS ADDRESS: BUSINESS ADDRESS: 4 BUSINESS TELEPHONE: 5 NAME: þ TITLE: DATE OF EMPLOYMENT: 8 BUSINESS ADDRESS: 9 BUSINESS TELEPHONE: 1D NAME: I TITLE: 12 DATE OF EMPLOYMENT: <sup>13</sup>BUSINESS ADDRESS: HBUSINESS TELEPHONE: 15 16 NAME: PDATE OF EMPLOYMENT: BUSINESS ADDRESS: BUSINESS TELEPHONE: 21 22NAME: 2 TITLE: 2 DATE OF EMPLOYMENT: BUSINESS ADDRESS: BUSINESS TELEPHONE: 2, NAME: 2, TITLE: 2, DATE OF EMPLOYMENT. 29 BUSINESS ADDRESS: BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 1 Page 11 of 25 NAME: SF 1 TITLE: 234 DATE OF EMPLOYMENT: Ż BUSINESS ADDRESS: BUSINESS TELEPHONE: 5 NAME: 6 TITLE: 5 DATE OF EMPLOYMENT: 8 G BUSINESS ADDRESS: 10 BUSINESS TELEPHONE: IL NAME: ٢ TITLE: 12 DATE OF EMPLOYMENT: 13 BUSINESS ADDRESS: BUSINESS TELEPHONE: 16 NAME: 17 TITLE: 3 DATE OF EMPLOYMENT: jo BUSINESS ADDRESS: 20 BUSINESS TELEPHONE: j\_NAME: 23 TITLE: 24DATE OF EMPLOYMENT: ¢ BUSINESS ADDRESS: BUSINESS TELEPHONE:  $\frac{2}{2}$   $\eta$  NAME: 3 AJ TITLE: 29 DATE OF EMPLOYMENT: 30 BUSINESS ADDRESS:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 1 Page 12 of 25 NAME: TITLE: DATE OF EMPLOYMENT: BUSINESS ADDRESS: BUSINESS TELEPHONE: NAME: TITLE: DATE OF EMPLOYMENT: BUSINESS ADDRESS: 9 BUSINESS TELEPHONE: 10 NAME: H TITLE: 12 DATE OF EMPLOYMENT: 13 BUSINESS ADDRESS: H BUSINESS TELEPHONE: 15 16 NAME: TITLE: 7 DATE OF EMPLOYMENT: 9 BUSINESS ADDRESS: 19 BUSINESS TELEPHONE: ŧ 22 NAME: ' 23 DATE OF EMPLOYMENT: Dy BUSINESS ADDRESS: BUSINESS TELEPHONE: 26 NAME: 27 TITLE: 29 DATE OF EMPLOYMENT: 24 BUSINESS ADDRESS: 30 BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 1 Page 13 of 25 DATE OF EMPLOYMENT: BUSINESS ADDRESS: BUSINESS TELEPHONE: DATE OF EMPLOYMENT: BUSINESS ADDRESS: BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 1 Page 14 of 25

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NAME: Fred Sauer: CTITLE: Services DATE OF EMPLOYMENT BUSINESS ADDRESS: BUSINESS TELEPHONE: 20

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FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 1 Page 15 of 25 NAME: TITLE: DATE OF EMPLOYMENT: BUSINESS ADDRESS: BUSINESS TELEPHONE: NAME: 1 TITLE: DATE OF EMPLOYMENT: BUSINESS ADDRESS: BUSINESS TELEPHONE: NAME: DATE OF EMPLOYMENT: <sup>13</sup>BUSINESS ADDRESS: HBUSINESS TELEPHONE: 16 NAME: R' DATE OF EMPLOYMENT BUSINESS ADDRESS: 2 BUSINESS TELEPHONE: 2 2NAME: 23TITLE: DATE OF EMPLOYMENT. JSBUSINESS ADDRESS: BUSINESS TELEPHO' 24 2 TITLE: 2 JUATE OF EMPLOYMENT. 2 JUATE OF EMPLOYMENT. 2 JUATE OF EMPLOYMENT. 2 JUANESS ADDRESS: 2 DUONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 1 Page 16 of 25

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 1 Page 17 of 25

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 1 Page 18 of 25

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 1 Page 19 of 25

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- 26225 Subject Matter About Which Persons Identified II. Below May Have Responsive Information: Instructions To Back Up Clearing Times
- 29 NAME:
- -30 TITLE:
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- 32 BUSINESS ADDRESS:
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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 1 Page 20 of 25

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 1 Page 21 of 25

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 1 Page 22 of 25

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 1 Page 23 of 25

NAME: 1 TITLE: 2345 DATE OF EMPLOYMENT. **BUSINESS ADDRESS:** BUSINESS TELEPHONE. NAME: þ TITLE:  $\dot{\eta}$ DATE OF EMPLOYMENT: 8 BUSINESS ADDRESS: 9 BUSINESS TELEPHONE: 10 NAME: 11 TITLE: 12 DATE OF EMPLOYMENT 13 BUSINESS ADDRESS: 14 BUSINESS TELEPHONE: 15 NAME: 16 TITLE j7 DATE OF EMPLOYMENT: 11 BUSINESS ADDRESS: 14 20 BUSINESS TELEPHONE: 32 NAME: TITLE: 23 DATE OF EMPLOYMENT: BUSINESS ADDRESS: BUSINESS TELEPHONE: ふう NAME: TITLE: 29 DATE OF EMPLOYMENT 24 BUSINESS ADDRESS: 30 BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 1 Page 24 of 25

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

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IV. Subject Matter About Which Persons Identified
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 Backing Up Clearing Times on OOS Troubles, which

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

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 2 Page 1 of 12

REQUEST: Please state the exact names, home addresses and phone numbers, and business addresses and phone numbers of all persons known by your 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: <u>Backing Up Clearing Times</u>
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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 2 Page 2 of 12

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 2 Page 4 of 12

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 2 Page 6 of 12

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 2 Page 8 of 12

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 2 Page 9 of 12

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

Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 2 Page 10 of 12 ł 2345 NAME: TITLE: DATE OF EMPLOYMENT: BUSINESS ADDRESS: BUSINESS TELEPHONE: 67 NAME: 8 TITLE: 9 DATE OF EMPLOYMENT: 10 **BUSINESS ADDRESS:** BUSINESS TELEPHONE: н 12 NAME: 13 TITLE: DATE OF EMPLOYMENT: 14 15 BUSINESS ADDRESS: BUSINESS TELEPHONE: 16 17 NAME: TITLE: i8 19 DATE OF EMPLOYMENT: 20 BUSINESS ADDRESS: BUSINESS TELEPHONE: 21 22 NAME: 23 TITLE: 24 DATE OF EMPLOYMENT: 25 BUSINESS ADDRESS: BUSINESS TELEPHONE: 26 21 NAME: 33 29 TITLE: DATE OF EMPLOYMENT: 30 BUSINESS ADDRESS: BUSINESS TELEPHONE: 31238 NAME: TITLE: DATE OF EMPLOYMENT: BUSINESS ADDRESS: BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 2 Page 12 of 12

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

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- 2 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 Citizens' Third Set of Interrogatories June 6, 1991 Item No. 3 Page 1 of 11

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: 2. TITLE: > DATE OF EMPLOYMENT: 26 BUSINESS ADDRESS: **H** BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 3 Page 2 of 11

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- 13 DATE OF EMPLOYMENT:
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- BUSINESS TELEPHONE: 15
- 16
  - NAME:
- 17 TITLE:
- DATE OF EMPLOYMENT: ig
- Jq BUSINESS ADDRESS: 20 BUSINESS TELEPHONE:
- 21
- NAME: 22 TITLE:
- 23 DATE OF EMPLOYMENT:
- 24 BUSINESS ADDRESS:
- 25 BUSINESS TELEPHONE:
- 26 NAME:
- TITLE: 58
- 29 DATE OF EMPLOYMENT: 30 BUSINESS ADDRESS:
- BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 3 Page 3 of 11

NAME:

{

2 TITLE:

- 7 DATE OF EMPLOYMENT:
- 4 BUSINESS ADDRESS: 🔬
- *C* BUSINESS TELEPHONE:

6 NAME:

9 TITLE:

3 DATE OF EMPLOYMENT:

- 9 BUSINESS ADDRESS:
- 10 BUSINESS TELEPHONE:

NAME:

CA TITLE:

3 DATE OF EMPLOYMENT:

14 BUSINESS ADDRESS:

IS BUSINESS TELEPHONE:

- 16 NAME:
- TITLE:
- 1: DATE OF EMPLOYMENT:
- **H BUSINESS ADDRESS:**
- 10 BUSINESS TELEPHONE:

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

- 24 NAME:
- 26 TITLE:
- 24 DATE OF EMPLOYMENT:
- 29 BUSINESS ADDRESS:
- 28 BUSINESS TELEPHONE:
- 2° NAME:
- 30 TITLE:
- 31 DATE OF EMPLOYMENT:
- 3 BUSINESS ADDRESS:
- **33 BUSINESS TELEPHONE:**

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 3 Page 4 of 11

NAME:
TITLE:
DATE OF EMPLOYMENT:
BUSINESS ADDRESS:
BUSINESS TELEPHONE:

NAME:
TITLE:
DATE OF EMPLOYMENT:
PUSINESS ADDRESS.

BUSINESS ADDRESS: BUSINESS TELEPHONE:

II NAME:

- 12 TITLE: 13 DATE OF EMPLOYMENT: 14 BUSINESS ADDRESS: 15 BUSINESS TELEPHONE:
- 16
- NAME:
- 17 NAME
- 19 19 19 20 BUSINESS ADDRESS: BUSINESS TELEPHONE:

21

- QaNAME:Q3TITLE:
- 23TITLE:24DATE OF EMPLOYMENT:25BUSINESS ADDRESS:
- BUSINESS TELEPHONE:
- 21 21 NAME: 23 TITLE: 29 DATE OF EMPLOYMENT: 30 BUSINESS ADDRESS:
  - BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 3 Page 5 of 11

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ł NAME:

- TITLE:
- 2345 DATE OF EMPLOYMENT:
- BUSINESS ADDRESS:
- BUSINESS TELEPHONE:
- NAME:
- 678 TITLE:
- DATE OF EMPLOYMENT:
- ٩ BUSINESS ADDRESS:
- 10 BUSINESS TELEPHONE:
- ١I. NAME:
- 12 TITLE:
- 13 DATE OF EMPLOYMENT:
- 14 15 BUSINESS ADDRESS:
- BUSINESS TELEPHONE:
- 16 NAME:
- 17 TITLE:
- 18 19 DATE OF EMPLOYMENT:
- BUSINESS ADDRESS:
- 20 BUSINESS TELEPHONE:
- 21 NAME:
- 22 TITLE:
- 23 DATE OF EMPLOYMENT:
- 24 BUSINESS ADDRESS:
- BUSINESS TELEPHONE:
- 26
- NAME: TITLE:
- 93 29 DATE OF EMPLOYMENT:
- BUSINESS ADDRESS:
- 30 · BUSINESS TELEPHONE:

Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 3 Page 6 of 11

1	NAME:
2	TITLE:
23	DATE OF EMPLOYMENT:
4	BUSINESS ADDRESS:
+	BUSINESS TELEPHONE:

NAME:

1

- 67 TITLE: 8 DATE OF EMPLOYMENT: BUSINESS ADDRESS: 9
- BUSINESS TELEPHONE: 10
- 11 NAME:
- TITLE: 12 DATE OF EMPLOYMENT: 13 BUSINESS ADDRESS: 14 BUSINESS TELEPHONE: , 15
- ٩.
- 16 NAME: TITLE: 17 DATE OF EMPLOYMENT:
- ig 19 20 BUSINESS ADDRESS: BUSINESS TELEPHONE:
- 21 NAME: 22 TITLE: 23 DATE OF EMPLOYMENT: 24 BUSINESS ADDRESS: 25 BUSINESS TELEPHONE:

262230		NAME: TITLE: DATE OF EMPLOYMENT: BUSINESS ADDRESS: BUSINESS TELEPHONE:
U	•	BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 3 Page 7 of 11

1 NAME:

- TITLE:
- DATE OF EMPLOYMENT:
- 2345 BUSINESS ADDRESS:
- BUSINESS TELEPHONE:
- 67 NAME:
- TITLE:
- 8 DATE OF EMPLOYMENT:
- 9 BUSINESS ADDRESS:
- 10 BUSINESS TELEPHONE:
- 11 NAME:
- 12 TITLE:
- 13 DATE OF EMPLOYMENT:
- iч BUSINESS ADDRESS:
- 15 BUSINESS TELEPHONE:
- - 16 NAME:
  - 17 TITLE:
- i8 19 DATE OF EMPLOYMENT:
- BUSINESS ADDRESS: 20 BUSINESS TELEPHONE:

21

- NAME: 22 TITLE:
- 23
- DATE OF EMPLOYMENT: 24 BUSINESS ADDRESS: 25
- BUSINESS TELEPHONE:
- 26
- NAME:
- 38 TITLE:
- 29 DATE OF EMPLOYMENT: 30 BUSINESS ADDRESS:
- BUSINESS TELEPHONE: .

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 3 Page 8 of 11

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12345	NAME: TITLE: DATE OF EMPLOYMENT: BUSINESS ADDRESS: BUSINESS TELEPHONE:
6789 10	NAME: TITLE: DATE OF EMPLOYMENT: BUSINESS ADDRESS: BUSINESS TELEPHONE:
11 12 13 14 15	NAME: TITLE: DATE OF EMPLOYMENT: BUSINESS ADDRESS: : BUSINESS TELEPHONE:
16 17 184 20	NAME: TITLE: DATE OF EMPLOYMENT: BUSINESS ADDRESS: BUSINESS TELEPHONE:
21 22 23 24 25	NAME: TITLE: DATE OF EMPLOYMENT: BUSINESS ADDRESS: BUSINESS TELEPHONE:
21	NAME: TITLE:

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28	TITLE:	
29	DATE OF EMPLOYMENT:	
30	BUSINESS ADDRESS:	
-0	· BUSINESS TELEPHONE:	

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 3 Page 9 of 11

- Ĩ NAME:
- Ś TITLE:
- **7 DATE OF EMPLOYMENT:**
- BUSINESS ADDRESS: 4
- BUSINESS TELEPHONE:
- 6 NAME:
- 1 TITLE:
- Ø DATE OF EMPLOYMENT:
- a BUSINESS ADDRESS:
- **BUSINESS TELEPHONE:**
- U NAME:
- (> TITLE:
- () DATE OF EMPLOYMENT:
- (a BUSINESS ADDRESS:
- K BUSINESS TELEPHONE:
- (6 NAME:
- (<sup>i</sup>) TITLE:
- G DATE OF EMPLOYMENT:
- 20 BUSINESS TELEPHONE:

21	III.	Subject Matter About Which Persons Identified
22		Below May Have Responsive Information:
23		Certain Circumstances Under Which Troubles
Ω <sup>ψ</sup>		Normally Statused OOS Were Not Statused OOS

- 25 NAME:
- 26 TITLE:
- 24 DATE OF EMPLOYMENT:
- 28 BUSINESS ADDRESS:
- *2*4 32601
- 3/ BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 3 Page 10 of 11

- I NAME: 2345 TITLE: DATE OF EMPLOYMENT: BUSINESS ADDRESS:
- BUSINESS TELEPHONE:
- þ NAME:
- 5 TITLE:
- 8 DATE OF EMPLOYMENT:
- 9 **BUSINESS ADDRESS:**
- 10 BUSINESS TELEPHONE:

NAME:

11

- 12 TITLE: 13 DATE OF EMPLOYMENT: 14 BUSINESS ADDRESS: .15 BUSINESS TELEPHONE:
  - NAME:
- 16 TITLE: i8 19 DATE OF EMPLOYMENT: BUSINESS ADDRESS: 20 BUSINESS TELEPHONE:
- 21 NAME: 22 TITLE:
- 23 DATE OF EMPLOYMENT: 24 BUSINESS ADDRESS: 25 BUSINESS TELEPHONE:
- 26
  - NAME:
- 3 કે TITLE:
- 29 DATE OF EMPLOYMENT: 30 BUSINESS ADDRESS:
  - · BUSINESS TELEPHONE:

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

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 3 Page 11 of 11

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÷.,

- ł NAME:
- TITLE:

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- 2345 DATE OF EMPLOYMENT:
- BUSINESS ADDRESS:
- BUSINESS TELEPHONE:
- 67 NAME:
- TITLE:
- 8 DATE OF EMPLOYMENT:
- q **BUSINESS ADDRESS:**
- 10 BUSINESS TELEPHONE:
- н NAME:
- 12 / TITLE:
- DATE OF EMPLOYMENT: 13
- 14 BUSINESS ADDRESS:
- 15 BUSINESS TELEPHONE:
- 16 NAME:
- 17 TITLE:
- ig 19 20 DATE OF EMPLOYMENT: BUSINESS ADDRESS:
- BUSINESS TELEPHONE:
- 21 NAME:
- 22 TITLE:
- 23 DATE OF EMPLOYMENT:
- 24 BUSINESS ADDRESS:
- 25 BUSINESS TELEPHONE:

21		
33 INFORMATION PROVIDED BY	BY: Stephen M. Klimacek, Esq.	
29 30	150 West Flagler Street, Ste. 1910 Miami, Florida 33130	0

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 4 Page 1 of 6

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 NAME: M TITLE: DATE OF EMPLOYMENT: À BUSINESS ADDRESS: 30 BUSINESS TELEPHONE:

- NAME:
  TITLE:
  DATE OF EMPLOYMENT:
- 34 BUSINESS ADDRESS:
- 2 BUSINESS TELEPHONE:

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N southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL ; Citizens' Third Set of Interrogatories June 6, 1991 Item No. 4 Page 2 of 6 NAME: Ì TITLE: 2 **3 DATE OF EMPLOYMENT:** Y BUSINESS ADDRESS: \* BUSINESS TELEPHONE: NAME: Ŀ ō. TITLE: ..... DATE OF EMPLOYMENT: BUSINESS ADDRESS: 12 BUSINESS TELEPHONE: : NAME: J TITLE: DATE OF EMPLOYMENT: 1. BUSINESS ADDRESS: J. BUSINESS TELEPHONE: 1 NAME: . • " TITLE: it DATE OF EMPLOYMENT: \* BUSINESS ADDRESS: 7. BUSINESS TELEPHONE: 2 NAME: 2. TITLE: LE DATE OF EMPLOYMENT: **DIA BUSINESS ADDRESS P**TBUSINESS TELEPHONE: AL NAME: 27 TITLE: >> DATE OF EMPLOYMENT: 2.4 BUSINESS ADDRESS: 1 TO BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 4 Page 3 of 6

NAME:

- J TITLE: 3 DATE OF EMPLOYMENT: ADDRESS: 4 BUSINESS ADDRESS:
- $\varsigma$  BUSINESS TELEPHONE:
- 6 NAME:
- TITLE: ŋ
- DATE OF EMPLOYMENT: g
- BUSINESS ADDRESS: a
- O BUSINESS TELEPHONE:

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

- 14 NAME:
  - 45 TITLE:
    - IC DATE OF EMPLOYMENT:
    - H BUSINESS ADDRESS:
    - **BUSINESS TELEPHONE:**
    - 14 NAME:
  - Je TITLE:
  - 21 DATE OF EMPLOYMENT:
  - 22 BUSINESS ADDRESS:
  - 23 BUSINESS TELEPHONE:
  - 24 NAME:
  - 2' TITLE:
  - 26 DATE OF EMPLOYMENT:
  - IN BUSINESS ADDRESS:
  - 23 BUSINESS TELEPHONE:
  - 29 NAME:

  - 26 TITLE: 31 DATE OF EMPLOYMENT:
  - 32 BUSINESS ADDRESS:
  - 73 BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens! Third Set of Interrogatories June 5, 1991 Item No. 4 Page 4 of 6

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NAME:

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- 2 TITLE: 3 DATE OF EMPLOYMENT:
- S BUSINESS ADDRESS: < BUSINESS TELEPHONE:
- NAME: . .
- 7 TITLE:
- \* DATE OF EMPLOYMENT:
- 4 BUSINESS ADDRESS:
- & BUSINESS TELEPHONE:
- II NAME:
- 12 DATE OF EMPLOYMENT
- 14 BUSINESS ADDRESS:
- C BUSINESS TELEPHONE:
- 16 NAME:
- 14 TITLE:
- 18 DATE OF EMPLOYMENT:
- 10 BUSINESS ADDRESS:
- **3.3 BUSINESS TELEPHONE:**
- > NAME:

N

22 TITLE:

17 DATE OF EMPLOYMENT:

- Jy BUSINESS ADDRESS:
- 2 BUSINESS TELEPHONE:
  - JC NAME: 2' TITLE:
  - 28 DATE OF EMPLOYMENT:
  - BUSINESS ADDRESS:
  - 3° BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 4 Page 5 of 6

- NAME: 3 TITLE: DATE OF EMPLOYMENT: + BUSINESS ADDRESS: BUSINESS TELEPHONE:
- 6 NAME:
- 7 TITLE:
- <sup>9</sup> DATE OF EMPLOYMENT:
- 9 BUSINESS ADDRESS: :
- (b) BUSINESS TELEPHONE:
- I NAME:
- 12 TITLE:
- 13 DATE OF EMPLOYMENT:
- 14 BUSINESS ADDRESS:
- 15 BUSINESS TELEPHONE:
- 16 NAME:
- 1? TITLE:
- 19 DATE OF EMPLOYMENT:
- 14 BUSINESS ADDRESS:
- 20 BUSINESS TELEPHONE:
- 21 NAME:
- 22 TITLE:
- Ø DATE OF EMPLOYMENT:
- Zy BUSINESS ADDRESS: :
- BUSINESS TELEPHONE:

21 III. Subject Matter About Which Persons Identified Below May Have Responsive Information: 21 28 Commitment Times Changed without Customer's Knowledge

- 29 NAME:
- 30 TITLE:
- 7, DATE OF EMPLOYMENT: 72 BUSINESS ADDRESS:
- **Z3BUSINESS TELEPHONE:**

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 4 Page 6 of 6

IV. Subject Matter About Which Persons Identified Below May Have Responsive Information: Instructions To Change Repair Due Date and <u>Time without Contacting Customer</u>

5 NAME:
6 TITLE:
7 DATE OF EMPLOYMENT:
6 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 Citizens' Third Set of Interrogatories June 6, 1991 Item No. 5 Page 1 of 2

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.

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

<u>}</u>< NAME: 26 TITLE: 21 DATE OF EMPLOYMENT: 29 BUSINESS ADDRESS: **AG BUSINESS TELEPHONE:** 

30 NAME:

- S TITLE: 32 DATE OF EMPLOYMENT:
- 33 BUSINESS ADDRESS:
- 34 BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 5 Page 2 of 2

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

H NAME:

TITLE:

6 DATE OF EMPLOYMENT:

- ີງ ອ BUSINESS ADDRESS:
- BUSINESS TELEPHONE:

NAME:

1

90 TITLE:

I DATE OF EMPLOYMENT:

12 BUSINESS ADDRESS: :

13 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 Citizens' Third Set of Interrogatories June 6, 1991 Item No. 6 Page 1 of 11

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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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 6 Page 2 of 11

' NAME:

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2 TITLE:

3 DATE OF EMPLOYMENT:

- 4 BUSINESS ADDRESS:
- **5 BUSINESS TELEPHONE:**
- 6 NAME:
- 7 TITLE:

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

14 BUSINESS ADDRESS:

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

2 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 FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 6 Page 3 of 11

- **NAME:**
- 2 TITLE:
- 3 DATE OF EMPLOYMENT:
- 4 BUSINESS ADDRESS: :
- 5 BUSINESS TELEPHONE:
- ( NAME:
- 7 TITLE:
- S DATE OF EMPLOYMENT:
- 9 BUSINESS ADDRESS:
- **10 BUSINESS TELEPHONE:**
- I 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:
- X NAME:
- 27 TITLE: 28 DATE OF EMPLOYMENT:
- 29 BUSINESS ADDRESS:
- 30 BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 6 Page 4 of 11

- ł NAME:
- 2 TITLE:
- 345 DATE OF EMPLOYMENT:
- BUSINESS ADDRESS:
- BUSINESS TELEPHONE:
- 6 NAME:
- 7 8 TITLE:
- DATE OF EMPLOYMENT:
- 9 BUSINESS ADDRESS:
- 16 BUSINESS TELEPHONE:
- 1) 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 FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 6 Page 5 of 11

ŧ NAME:

- 2 TITLE:
- 3 DATE OF EMPLOYMENT:
- Ý BUSINESS ADDRESS:
- 5 BUSINESS TELEPHONE:

6 NAME:

- 7 TITLE:
- 8 DATE OF EMPLOYMENT:
- 9 BUSINESS ADDRESS:
- 10 BUSINESS TELEPHONE:
- I NAME:
- 12 TITLE:
- 13 DATE OF EMPLOYMENT:
- 14 BUSINESS ADDRESS:
- **15 BUSINESS TELEPHONE:**
- 16 NAME:
- TITLE: 17
- DATE OF EMPLOYMENT: (8
- BUSINESS ADDRESS:
- 20 BUSINESS TELEPHONE:

2| NAME:

- 22 TITLE:
- 25 DATE OF EMPLOYMENT:
- BUSINESS ADDRESS:
- 24 BUSINESS ADDRESS: 25 BUSINESS TELEPHONE:
- 26 NAME:
- 27 TITLE:
- 28 DATE OF EMPLOYMENT:
- 29 BUSINESS ADDRESS:
- 36 BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 6 Page 6 of 11

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- 2 TITLE:
- 3 DATE OF EMPLOYMENT:
- ч BUSINESS ADDRESS:
- 5 BUSINESS TELEPHONE:
- 6 NAME:
- 7 TITLE: 9 DATE OF EMPLOYMENT:
- 9 BUSINESS ADDRESS:
- 10 BUSINESS TELEPHONE:
- li NAME:
- 12 TITLE:
- 1) DATE OF EMPLOYMENT:
- (4 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:
- 21 NAME:
- 27 TITLE:
- 28 DATE OF EMPLOYMENT:
- 29 BUSINESS ADDRESS:
- 30 BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 6 Page 7 of 11

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- こう TITLE:
- DATE OF EMPLOYMENT:
- ų. BUSINESS ADDRESS:
- 5 BUSINESS TELEPHONE:

þ NAME:

- 7 TITLE:
- 8 DATE OF EMPLOYMENT:
- q BUSINESS ADDRESS:
- 10 BUSINESS TELEPHONE:

V. 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:
- DATE OF EMPLOYMENT: 16
- BUSINESS ADDRESS:
- 19 BUSINESS TELEPHONE:

19 NAME:

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

- 24 NAME: 25 TITLE:
- 24 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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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens! Third Set of Interrogatories June 6, 1991 Item No. 6 Page 8 of 11

NAME:

- 2 TITLE:
- 3 DATE OF EMPLOYMENT:
- **4** BUSINESS ADDRESS:
- 5 BUSINESS TELEPHONE:

6 NAME:

- 9 DATE OF EMPLOYMENT: 9 BUSINESS ADDITION
- 10 BUSINESS TELEPHONE:

| NAME:

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

16 NAME:

- 17 TITLE:
- IS DATE OF EMPLOYMENT:
- 9 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 FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 6 Page 9 of 11

- 1 NAME:
- እ TITLE:
- 3 DATE OF EMPLOYMENT:
- ų BUSINESS ADDRESS:
- 5 BUSINESS TELEPHONE:
- 6 NAME:
- TITLE: 7
- DATE OF EMPLOYMENT:
- 89 BUSINESS ADDRESS:
- BUSINESS TELEPHONE: 10
- // NAME:
- 12 TITLE:
- 13 DATE OF EMPLOYMENT:
- 14 BUSINESS ADDRESS: 15 BUSINESS TELEPHONE:
- 16 NAME:
- 17 TITLE:
- 18 DATE OF EMPLOYMENT:
- 9 BUSINESS ADDRESS:
- 20 BUSINESS TELEPHONE:
- $\geq$  NAME:
- 22 TITLE:
- 23 DATE OF EMPLOYMENT: 24 BUSINESS ADDRESS:
- 25 BUSINESS TELEPHONE:
- 2 NAME:
- 21 TITLE:
- 28 DATE OF EMPLOYMENT:
- 21 BUSINESS ADDRESS:
- 30 BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 6 Page 10 of 11

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:
- (| NAME:
- (2 TITLE:
- 13 DATE OF EMPLOYMENT:
- 14 BUSINESS ADDRESS:
- IS BUSINESS TELEPHONE:
  - /6 NAME:
  - 17 TITLE:
  - 18 DATE OF EMPLOYMENT:
  - 19 BUSINESS ADDRESS:
  - 20 BUSINESS TELEPHONE:

21 NAME:

- 27 TITLE:
- 23 DATE OF EMPLOYMENT:
- AF BUSINESS ADDRESS:
- 25 BUSINESS TELEPHONE:
- 2 NAME:
- 27 TITLE:
- JS DATE OF EMPLOYMENT:
- 29 BUSINESS ADDRESS:
- 30 BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 6 Page 11 of 11

TITLE: 2 DATE OF EMPLOYMENT: 3 **BUSINESS ADDRESS:** Ч BUSINESS TELEPHONE: 5 67 III. Subject Matter About Which Persons Identified Below May Have Responsive Information: Other % NAME: 9 TITLE: 10 DATE OF EMPLOYMENT: ( BUSINESS ADDRESS:

I NAME:

C

2 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 Citizens' Third Set of Interrogatories June 6, 1991 Item No. 7 Page 1 of 5

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: <u>Statusing Test-OKs as OOS</u>
- 25 NAME:
  26 TITLE:
  27 DATE OF EMPLOYMENT:
  28 BUSINESS ADDRESS:
  29 BUSINESS TELEPHONE:
- 30 NAME:

1

- 3| TITLE:
- 32 DATE OF EMPLOYMENT:
- 33 BUSINESS ADDRESS:
- 34 BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 7 Page 2 of 5

NAME:

- > 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:

| NAME:

12 TITLE:

1

- 13 DATE OF EMPLOYMENT:
- 14 BUSINESS ADDRESS:
- BUSINESS TELEPHONE:

6 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:
- A NAME:
- 27 TITLE:

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28 DATE OF EMPLOYMENT:

- 29 BUSINESS ADDRESS:
- 30 BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens! Third Set of Interrogatories June 6, 1991 Item No. 7 Page 3 of 5

L. NAME:

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

NAME:

- 67 TITLE:
- DATE OF EMPLOYMENT:
- 899 BUSINESS ADDRESS:
- BUSINESS TELEPHONE: 1D
- NAME: 11
- TITLE: 12
- DATE OF EMPLOYMENT: 3
- BUSINESS ADDRESS: 14
- BUSINESS TELEPHONE: 15

16 NAME:

۸.

- TITLE: 17
- 18 DATE OF EMPLOYMENT:
- 9 BUSINESS ADDRESS:
- BUSINESS TELEPHONE: 20

NAME: 21

- 22 TITLE:
- 23 DATE OF EMPLOYMENT:
- 24 BUSINESS ADDRESS: 25 BUSINESS TELEPHON BUSINESS TELEPHONE:
- NAME: 26
- 27 TITLE:
- DATE OF EMPLOYMENT: BUSINESS ADDRESS: 28
- 29
- 30 BUSINESS TELEPHONE:

Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 7 Page 4 of 5

1 NAME:

- 2 TITLE:
- 3 DATE OF EMPLOYMENT:
- BUSINESS ADDRESS:
- ч 5 BUSINESS TELEPHONE:
- 67 NAME:
- TITLE:
- 8 DATE OF EMPLOYMENT:
- 9 BUSINESS ADDRESS:
- BUSINESS TELEPHONE: 10
- || NAME:
- 12 TITLE:
- 13 DATE OF EMPLOYMENT: 14 BUSINESS ADDRESS:
- 5 BUSINESS TELEPHONE:
  - 6 NAME:
  - 17 TITLE:
  - 18 DATE OF EMPLOYMENT:
  - 4 BUSINESS ADDRESS:
  - 20 BUSINESS TELEPHONE:

2 NAME:

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

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 7 Page 5 of 5

) NAME:

- 2 TITLE:
- 3 DATE OF EMPLOYMENT:
- 4 BUSINESS ADDRESS:
- 5 BUSINESS TELEPHONE:
- NAME:
- 7 TITLE:
- & DATE OF EMPLOYMENT:
- BUSINESS ADDRESS: G
- 10 BUSINESS TELEPHONE:
- | 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:
- ) & NAME:
- 19 TITLE:
- 20 DATE OF EMPLOYMENT:
- 24 BUSINESS ADDRESS:
- 22 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 Citizens' Third Set of Interrogatories June 6, 1991 Item No. 8 Page 1 of 4

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

NAME:
TITLE:
DATE OF EMPLOYMENT:
BUSINESS ADDRESS:
BUSINESS TELEPHONE:

3| NAME:

- 32 TITLE:
- 33 DATE OF EMPLOYMENT:
- 34 BUSINESS ADDRESS:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 8 Page 2 of 4

| BUSINESS TELEPHONE:

2 NAME:

.

- 3 TITLE:
- 4 DATE OF EMPLOYMENT:
- BUSINESS ADDRESS:
- ( BUSINESS TELEPHONE:
- 7 NAME:
- 9 TITLE: 9 DATE OF EMPLOYMENT:
- 10 BUSINESS ADDRESS:
- || BUSINESS TELEPHONE:
- 12 NAME:
- 13 TITLE:
- IN DATE OF EMPLOYMENT:
- 15 BUSINESS ADDRESS:
- 16 BUSINESS TELEPHONE:
- 7 NAME:
- IN TITLE:
- (9 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:
- 3| BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 8 Page 3 of 4

NAME: ۱.

- TITLE: 2
- 3 DATE OF EMPLOYMENT:
- BUSINESS ADDRESS:
- ý S BUSINESS TELEPHONE:
- Ģ NAME:
- 7999 TITLE:
- DATE OF EMPLOYMENT:
- BUSINESS ADDRESS:
- 1D BUSINESS TELEPHONE:
- 11 NAME:
- 12 TITLE:
- 13 DATE OF EMPLOYMENT:
- 14 BUSINESS ADDRESS:
- 15 BUSINESS TELEPHONE:

1

- 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:

<u>م</u>لہ II. Subject Matter About Which Persons Identified Below May Have Responsive Information: 27 Customer Direct Reports Reported 28 29 as Employee Originated Reports

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

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 8 Page 4 of 4

NAME:

- 2 TITLE:
- 3 DATE OF EMPLOYMENT:
- y BUSINESS ADDRESS:
- 5 BUSINESS TELEPHONE:

6 NAME:

- 7 TITLE:
- \$ DATE OF EMPLOYMENT:
- 9 BUSINESS ADDRESS:
- 10 BUSINESS TELEPHONE:
- || NAME:
- 12 TITLE:
- 13 DATE OF EMPLOYMENT:
- 4 BUSINESS ADDRESS:
- 15 BUSINESS TELEPHONE:
- ζ\_
- ( NAME: :
- 17 TITLE:
- 18 DATE OF EMPLOYMENT:
- 9 BUSINESS ADDRESS:
- 26 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 Citizens' Third Set of Interrogatories June 6, 1991 Item No. 9 Page 1 of 5

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.

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: <u>Creation of Cable Failure</u>
- 24 NAME:
- 25 TITLE:
- 26 DATE OF EMPLOYMENT:
- 21 BUSINESS ADDRESS:
- 28 BUSINESS TELEPHONE:
- 29 NAME:
- 30 TITLE:
- 31 DATE OF EMPLOYMENT:
- 32 BUSINESS ADDRESS:
- 33 BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 9 Page 2 of 5

- Subject Matter About Which Persons Identified II. Below May Have Responsive Information: Alleged Creation of Fictitious Trouble Reports
- 4 NAME:
- 5 TITLE:
- 6 DATE OF EMPLOYMENT:
- BUSINESS ADDRESS: 4 7
- *Y* BUSINESS TELEPHONE:
- 9 NAME: '
- 10 TITLE:
- **11 DATE OF EMPLOYMENT:**
- (2 BUSINESS ADDRESS:
- 13 BUSINESS TELEPHONE:
- /∜ NAME:

κ.

- 15 TITLE: 16 DATE OF EMPLOYMENT:
- 17 BUSINESS ADDRESS: 5
- 18 BUSINESS TELEPHONE:
- 19 NAME:
- 20 TITLE:
- 21 DATE OF EMPLOYMENT:
- 12 BUSINESS ADDRESS:
- 23 BUSINESS TELEPHONE:
- 24 NAME:
- 25 TITLE:
- 26 DATE OF EMPLOYMENT:
- 27 BUSINESS ADDRESS:
- 28 BUSINESS TELEPHONE:
- 29 NAME:
- TITLE: 30
- 3/ DATE OF EMPLOYMENT:
- 32 BUSINESS ADDRESS:
- 33 BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 9 Page 3 of 5

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NAME:

- 2 TITLE:
- 3 DATE OF EMPLOYMENT:
- **U** BUSINESS ADDRESS:
- **5 BUSINESS TELEPHONE:**

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- NAME:
- 7 TITLE:
- 9 DATE OF EMPLOYMENT:
- 9 BUSINESS ADDRESS:
- 16 BUSINESS TELEPHONE:

|| NAME:

12 TITLE:

- 13 DATE OF EMPLOYMENT: 14 BUSINESS ADDRESS:
- 5 BUSINESS TELEPHONE:
- 6 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:

Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 9 Page 4 of 5

NAME: t

- 2 TITLE:
- 3 DATE OF EMPLOYMENT:
- BUSINESS ADDRESS: ч
- BUSINESS TELEPHONE: 5
- 6 NAME:
- 1 TITLE:
- 8 DATE OF EMPLOYMENT:
- 9 BUSINESS ADDRESS:
- **ID BUSINESS TELEPHONE:**
- NAME:
- 12 TITLE:
- B DATE OF EMPLOYMENT:
- W BUSINESS ADDRESS:
- BUSINESS TELEPHONE: 15

#### 16 III. Subject Matter About Which Persons Identified

- Below May Have Responsive Information: 17
- 18 Alleged Fictitious Customer Direct Reports Shown Test-OKs
- 9 NAME:
- 20 TITLE:
- 21 DATE OF EMPLOYMENT: 22 BUSINESS ADDRESS:
- 23 BUSINESS TELEPHONE:
- 24 NAME:
- 25 TITLE:
- 26 DATE OF EMPLOYMENT:
- 27 BUSINESS ADDRESS:
- 24 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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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 9 Page 5 of 5

NAME:

- 2 TITLE:
- 3 DATE OF EMPLOYMENT:
- ý BUSINESS ADDRESS: 9
- 5 BUSINESS TELEPHONE:

4 NAME:

- 7 TITLE:
- 9 DATE OF EMPLOYMENT:
- 9 BUSINESS ADDRESS:
- 10 BUSINESS TELEPHONE:

V. Subject Matter About Which Persons Identified 2 Below May Have Responsive Information: Other

- 13 NAME:
- 14 TITLE:
- 15 DATE OF EMPLOYMENT:
- W BUSINESS ADDRESS:
- 17 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 Citizens' Third Set of Interrogatories June 6, 1991 Item No. 10 Page 1 of 10

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.

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.

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

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

29 BUSINESS TELEPHONE:

30 NAME: 31 TITLE: 32 DATE OF EMPLOYMENT:

33 BUSINESS ADDRESS: 34 BUSINESS MODRESS:

BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 10 Page 2 of 10

1 NAME:

2 TITLE:

3 DATE OF EMPLOYMENT:

**y** BUSINESS ADDRESS:

5 BUSINESS TELEPHONE:

6 NAME:

7 TITLE: 8 DATE OF EMPLOYMENT:

**b** DATE OF EMPLOYMEN BUSINESS ADDRESS:

**10** BUSINESS TELEPHONE:

} NAME:

12 TITLE:

13 DATE OF EMPLOYMENT:

14 BUSINESS ADDRESS:

15 BUSINESS TELEPHONE:

6 NAME:

17 TITLE:

18 DATE OF EMPLOYMENT:

9 BUSINESS ADDRESS:

20 BUSINESS TELEPHONE:

) NAME: 22 TITLE:

DATE OF EMPLOYMENT:

14 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 FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 . Item No. 10 Page 3 of 10

) NAME:

- 2 TITLE:
- <sup>3</sup> DATE OF EMPLOYMENT: <sup>4</sup> BUSINESS ADDRESS:
- 5 BUSINESS TELEPHONE:
- 6 NAME:
- 7 TITLE:
- y DATE OF EMPLOYMENT:
- 9 BUSINESS ADDRESS:
- 10 BUSINESS TELEPHONE:
  - Subject Matter About Which Persons Identified Below II. May Have Responsive Information: Alleged Improper Status of OOS or Alleged Instructions To Status OOS Improperly
- 5 NAME:
- 16 TITLE:
- 17 DATE OF EMPLOYMENT:
- I BUSINESS ADDRESS:
- 19 BUSINESS TELEPHONE:

20 NAME:

- 2) TITLE:
- 2.2. 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:
- 3| TITLE:
- 32 DATE OF EMPLOYMENT:
- 33 BUSINESS ADDRESS:
- 34 BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 10 Page 4 of 10

I NAME:

2 TITLE:

3 DATE OF EMPLOYMENT:

4 BUSINESS ADDRESS:

5 BUSINESS TELEPHONE:

Ļ NAME:

7 TITLE:

g DATE OF EMPLOYMENT: BUSINESS ADDRESS:

(0 BUSINESS TELEPHONE:

**NAME:** 

12 TITLE:

13 DATE OF EMPLOYMENT:

14 BUSINESS ADDRESS:

15 BUSINESS TELEPHONE:

IL NAME:

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- i7 TITLE:
  18 DATE OF EMPLOYMENT:
- 9 BUSINESS ADDRESS: 20 BUSINESS TELEPHONE:

24 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 FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 10 Page 5 of 10

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**NAME:** 

2 TITLE:

3 DATE OF EMPLOYMENT:

**4 BUSINESS ADDRESS:** 

5 BUSINESS TELEPHONE:

( NAME:

7 TITLE:

**§ DATE OF EMPLOYMENT:** 

9 BUSINESS ADDRESS:

(O BUSINESS TELEPHONE:

NAME:

12 TITLE:

13 DATE OF EMPLOYMENT: 14 BUSINESS ADDRESS: 9

15 BUSINESS TELEPHONE:

- 16 NAME:
- 17 TITLE:
- 8 DATE OF EMPLOYMENT:
- 19 BUSINESS ADDRESS:
- 20 BUSINESS TELEPHONE:
- 2 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:
- 35 BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 10 Page 6 of 10

NAME:

- 2 TITLE:
- 3 DATE OF EMPLOYMENT:
- 4 BUSINESS ADDRESS:
- **5 BUSINESS TELEPHONE:**

( NAME:

- 7 TITLE:
- **§ DATE OF EMPLOYMENT:**
- 9 BUSINESS ADDRESS:
- 10 BUSINESS TELEPHONE:
  - IV. Subject Matter About Which Persons Identified Below May Have Responsive Information: <u>Misuse of Employee Code</u>

If NAME:

- 5 TITLE:
- 16 DATE OF EMPLOYMENT:
- 17 BUSINESS ADDRESS:
- g BUSINESS TELEPHONE:
- 19 NAME:
- 20 TITLE:
- 2 DATE OF EMPLOYMENT:
- 22 BUSINESS ADDRESS:
- 23 BUSINESS TELEPHONE:

24 NAME:

- 25 TITLE:
- 24 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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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 10 Page 7 of 10

1 NAME:

> TITLE:

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- 3 DATE OF EMPLOYMENT:
- **4 BUSINESS ADDRESS:**
- 5 BUSINESS TELEPHONE:
- 5 NAME:
- TITLE:
- 9 DATE OF EMPLOYMENT:
- 9 BUSINESS ADDRESS:
- O BUSINESS TELEPHONE:
- [ NAME:
- 12 TITLE:
- 13 DATE OF EMPLOYMENT:
- 14 BUSINESS ADDRESS:
- 5 BUSINESS TELEPHONE:
- | NAME:
- 17 TITLE:
- is date of employment:
- (9 BUSINESS ADDRESS:
- 20 BUSINESS TELEPHONE:
- 2) NAME: 22 TITLE:
- 13 DATE OF EMPLOYMENT:
- 24 BUSINESS ADDRESS:
- 25 BUSINESS TELEPHONE:
  - v. Subject Matter About Which Persons Identified Below May Have Responsive Information:

<u>Central Office Failure Closed To Test-OK Code</u>

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

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 10 Page 8 of 10

NAME:

- 2 TITLE:
- DATE OF EMPLOYMENT:
- 3 DATE OF EMPLOYMEN 4 BUSINESS ADDRESS: 5 BUSINESS TELEPHON BUSINESS TELEPHONE:

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

9 NAME:

- 10 TITLE:
- II 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:
- 2% TITLE:

- 29 DATE OF EMPLOYMENT: 30 BUSINESS ADDRESS:
- 31 BUSINESS TELEPHONE:

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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 10 Page 9 of 10

NAME:

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- λ TITLE:
- 3 DATE OF EMPLOYMENT:
- 4 BUSINESS ADDRESS:
- 6 BUSINESS TELEPHONE:
- 6 NAME:
- 7 TITLE:
- **§ DATE OF EMPLOYMENT:**
- 9 BUSINESS ADDRESS:
- 10 BUSINESS TELEPHONE:

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

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- (3 NAME:
- 14 TITLE: 15 DATE OF EMPLOYMENT:
- 16 BUSINESS ADDRESS:
- 17 BUSINESS TELEPHONE:
- 8 NAME:
- 19 TITLE:
- 10 DATE OF EMPLOYMENT:
- 21 BUSINESS ADDRESS:
- LA 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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Southern Bell Telephone and Telegraph Company FPSC Docket No. 910163-TL Citizens' Third Set of Interrogatories June 6, 1991 Item No. 10 Page 10 of 10

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

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

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