

J. Phillip Carver  
General Attorney

Southern Bell Telephone  
and Telegraph Company  
c/o Marshall M. Criser III  
Suite 400  
150 So. Monroe Street  
Tallahassee, Florida 32301  
Phone (305) 530-5558

June 10, 1993

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

Re: Docket No. 910163-TL - Repair Service Investigation

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Notice of Intent to Request Specified Confidential Classification, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely yours,

*J. Phillip Carver*  
J. Phillip Carver (02)

ACK \_\_\_\_\_

AFA \_\_\_\_\_

APP \_\_\_\_\_  
Enclosures

CAF \_\_\_\_\_

cc: All Parties of Record  
A. M. Lombardo

CTR Harris R. Anthony

EAG R. Douglas Lackey

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FPSC-RECORDS/REPORTING

**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 10<sup>th</sup> day of June, 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

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Vicki Gordon Kaufman  
McWhirter, Grandoff & Reeves  
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J. P. Gillan and Associates  
Post Office Box 541038  
Orlando, Florida 32854-1038

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Wiggins & Villacorta, P.A.  
Post Office Drawer 1657  
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Tallahassee, FL 32399-1400

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Atlanta, Georgia 30346-2102

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& Ervin  
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President  
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8130 Baymeadows Circle, West  
Jacksonville, FL 32256

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Tampa, FL 33609

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Gerald B. Curington  
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Florida Public Svc. Commission  
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Tallahassee, FL 32399-0863

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

  
J. Phillip Connor

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition on behalf of )  
Citizens of the State of Florida ) Docket No. 910163-TL  
to initiate investigation into )  
integrity of Southern Bell )  
Telephone and Telegraph Company's )  
repair service activities and )  
reports. )  
\_\_\_\_\_ ) Filed: June 10, 1993

**SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
NOTICE OF INTENT TO REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATION**

COMES NOW BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), and pursuant to Rule 25-22.006, Florida Administrative Code, files its Notice of Intent to Request Specified Confidential Classification.

1. The Staff of the Florida Public Service Commission ("Staff") issued a Notice of Deposition in the referenced docket in order to take the depositions of Southern Bell employees on May 4th, 5th, and 6th, 1993, at 3100 Emerson Street, Jacksonville, Florida. The depositions of the following employees who were deposed at the above-noted dates have been transcribed and were received by Southern Bell on the date of this filing: G. M. Pellegrini, William H. Joost, Charles R. Stout, Lorna Foutz, Loretta Bond, Janet R. Willis, Barbara C. Whichman, Glovine Williams, Judith Rote, Denise E. Crosby, Deborah Phillips, W. V. Haltiwanger, Rena Hansberry, Leon Metz,

Evelyn Kilgore, Darrall R. Wilcox, Linda G. Moniz, Kathryn Roberts, Joyce S. Scott, Barbara E. Sheppard, and Martha Stephens.

2. Some of the information contained in the depositions is proprietary. Included is information containing, among other things, employee names, home addresses, home phone numbers, and business addresses and telephone numbers. This information is clearly confidential and proprietary under Florida Statutes, Section 364.183(f), which provides that "proprietary confidential business information" includes "employee personnel information unrelated to compensation, duties, qualification, or responsibilities."

3. The four areas of employee personnel information that are not, per se, confidential pursuant to Section 364.183(f), Florida Statutes, are compensation duties, qualifications, and responsibilities of an employee. A common sense reading of this list demonstrates that the employee-specific information provided in response to the deposition questions do not fit any of the exceptions and thus are, per se, confidential under Section 364.183(f), Florida Statutes.

4. Because this information contains proprietary information, Southern Bell is filing this Notice of Intent to Request Specified Confidential Classification, pursuant to Rule

25-22.006(3)(a)(b)(5), Florida Administrative Code, in order to allow the Staff to take possession of the deposition transcripts without delay. The original of this notice has been filed with the Division of Records and Reporting, and a copy has been served on the Division requesting the information. The written Staff Notice of Deposition is attached hereto.

Respectfully submitted this 10th Day of June, 1993.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY

*Harris R. Anthony*  
HARRIS R. ANTHONY <sup>JP2</sup>  
c/o Marshall M. Criser, III  
400 - 150 South Monroe Street  
Tallahassee, Florida 32301  
(305) 530-5555

*R. Douglas Lackey*  
R. DOUGLAS LACKEY <sup>JP2</sup>  
NANCY B. WHITE  
4300 - 675 West Peachtree St.  
Atlanta, Georgia 30375  
(404) 529-5387

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into the integrity of SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S repair service activities and reports. ) DOCKET NO. 910163-TL  
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In re: Investigation into SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S compliance with Rule 25-4.110(2), F.A.C., Rebates. ) DOCKET NO. 910727-TL  
 )  
 ) FILED: 04/28/93  
 )  
 )

**NOTICE OF DEPOSITIONS**

TO: Harris R. Anthony  
 c/o Marshall M. Criser, III  
 150 South Monroe Street  
 Suite 400  
 Tallahassee, Florida 32301

NOTICE is hereby given that the Staff of the Florida Public Service Commission will take the depositions of the following named individuals at 3100 Emerson Street, Jacksonville, Florida, at Mr. Rupe's conference room on the second floor, beginning Tuesday May 4, 1993 at 8:00 a.m. and continuing through Thursday May 6, 1993:

Tuesday May 4, 1993

8:00 am Pellegrini, G. M.  
 9:15 am Joost, William H.  
 10:30 am Stout, Charles R.  
 12:30 pm Foutz, Lorna  
 1:45 pm Bond, Loretta  
 2:50 pm Willis, Janet R.  
 3:55 pm Whichman, Barbara C.  
 5:00 pm Williams, Glovine

Wednesday May 5, 1993

8:00 am Rote, Judith  
 9:00 am Crosby, Denise E.  
 10:30 am Davis, Melanie D.  
 12:30 pm Phillips, Deborah  
 1:45 pm Haltiwanger, W. V.  
 2:50 pm Hansberry, Rena  
 3:55 pm Metz, Leon  
 5:00 pm Kilgore, Evelyn

Thursday May 6, 1993

8:00 am Wilcox, Darrall R.  
 9:15 am Moniz, Linda G.  
 10:30 am Roberts, Kathryn  
 12:30 pm Scott, Joyce S.  
 1:45 pm Sheppard, Barbara E.  
 2:50 pm Stephens, Martha

**RECEIVED**

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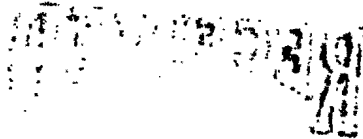
NOTICE OF DEPOSITIONS  
DOCKETS NOS. 910163-TL, 910727-TL  
PAGE 2

These depositions are being taken for purposes of discovery, for use at trial, or for any other purpose allowed under the Florida Rules of Civil Procedure and the Rules of the Florida Public Service Commission.

Please govern yourselves accordingly.

  
\_\_\_\_\_  
JEAN R. WILSON  
Staff Counsel

FLORIDA PUBLIC SERVICE COMMISSION  
101 East Gaines Street  
Fletcher Building - Room 226  
Tallahassee, Florida 32399-0863  
(904) 487-2740





BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the integrity of SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S repair service activities and reports. ) DOCKET NO. 910163-TL

In re: Investigation into SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S compliance with Rule 25-4.110(2), F.A.C., Rebates. ) DOCKET NO. 910727-TL ISSUED: 04/28/93

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and copies of NOTICE OF DEPOSITIONS have been furnished by U.S. Mail this 28th day of May, 1993 to the following:

Harris R. Anthony
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