



JACK SHREVE  
PUBLIC COUNSEL

**STATE OF FLORIDA**  
**OFFICE OF THE PUBLIC COUNSEL**

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

July 7, 1993

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

Re: Docket No. 920260-TL

Dear Mr. Tribble:

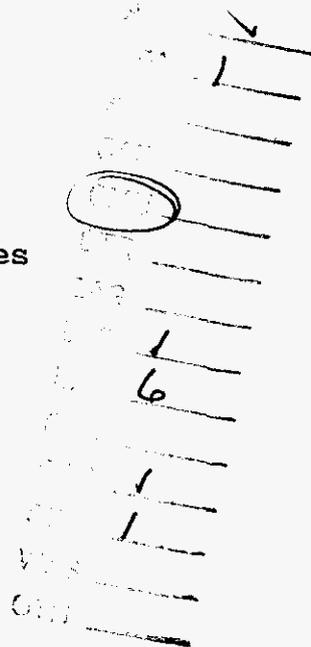
Enclosed for filing in the above-referenced docket on behalf of the Citizens of the State of Florida are the original and 15 copies of the Citizens' Response and Opposition to Southern Bell's Motion for Reconsideration of Order No. PSC-93-0905-CFO-TL.

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

Sincerely,

Charles J. Beck  
Deputy Public Counsel

Enclosures



DOCUMENT NUMBER-DATE

07217 JUL-7 93

OFFICE OF RECORDS AND REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

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

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

Investigation into Southern Bell ) Docket No. 910727-TL  
Telephone and Telegraph )  
Company's Compliance with Rule )  
25-4.110(2), F.A.C. )  
Filed July 7, 1993

CITIZENS' RESPONSE AND OPPOSITION TO SOUTHERN BELL'S  
MOTION FOR RECONSIDERATION OF ORDER NO. PSC-93-0905-CFO-TL

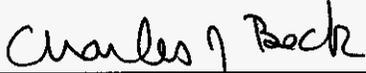
The Citizens of Florida ("Citizens"), by and through Jack Shreve, Public Counsel, file this response and opposition to the motion for reconsideration of order no. PSC-93-0905-CFO-TL filed by BellSouth Telecommunications, inc., d/b/a Southern Bell Telephone & Telegraph Company ("Southern Bell") on June 25, 1993.

1. The Citizens adopt previous pleadings opposing Southern Bell's requests for confidentiality concerning the names of persons disciplined or otherwise involved in the review of repair or sales activities in dockets 910163-TL and 900960-TL. Those pleadings include (1) our response filed February 15, 1993 to the request for confidential classification and motion for a permanent protective order regarding the testimony of R. Earl Poucher and Dr. Mark Cooper, (2) our response and opposition filed on March 10, 1993, to the "motion for a temporary protective order for its responses to Public Counsel's third and fifth set of interrogatories, originally filed in docket 910163-TL" filed by Southern Bell, (3) our response filed March 15, 1993, to the request for confidential classification and motion for a permanent protective order filed by Southern Bell on March 1, 1993 concerning the rebuttal testimony of R. Earl Poucher, and (4) our opposition filed April 26, 1993 to the motion for a permanent protective order filed by Southern Bell on April 16, 1993, as amended on April 21, 1993, in docket 910163-TL.

WHEREFORE, the Citizens oppose the motion for reconsideration of order no. PSC-93-0905-CFO-TL filed by Southern Bell on June 25, 1993.

Respectfully submitted,

JACK SHREVE  
Public Counsel

  
\_\_\_\_\_  
Charles J. Beck  
Deputy Public Counsel

JANIS SUE RICHARDSON  
Associate Public Counsel

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

(904) 488-9330

Attorneys for the Citizens  
of the State of Florida

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

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail or hand-delivery to the following parties on this 7th day of July, 1993.

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

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

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

Doug Lackey  
BellSouth Telecommunications,  
Inc. (Southern Bell Telephone  
& Telegraph Company)  
4300 Southern Bell Center  
Atlanta, GA 30375

Mike Twomey  
Department of Legal Affairs  
Attorney General  
The Capitol Bldg., 16th Floor  
Tallahassee, FL 32399-1050

Laura L. Wilson  
Messer, Vickers, Caparello,  
Madsen & Lewis, P.A.  
P.O. Box 1876  
Tallahassee, FL 32302-1876

Angela Green  
Tracy Hatch  
Jean Wilson  
Division of Legal Services  
Fla. Public Service Commission  
101 East Gaines Street  
Tallahassee, FL 32301

Edward Paschall  
Florida AARP Capital City Task  
Force  
1923 Atapha Nene  
Tallahassee, FL 32301

The American Association of  
Retired Persons  
c/o Bill L. Bryant, Jr.  
Foley & Lardner  
215 S. Monroe St., Suite 450  
P.O. Box 508  
Tallahassee, FL 32302-0508

Richard D. Melson  
Hopping, Boyd, Green & Sams  
23 South Calhoun Street  
P.O. Box 6526  
Tallahassee, FL 32314

Michael J. Henry  
MCI Telecommunications Corp.  
MCI Center  
Three Ravinia Drive  
Atlanta, GA 30346

Lance C. Norris, President  
Florida Pay Telephone Assn., Inc.  
8130 Baymeadows Circle, West  
Suite 202  
Jacksonville, FL 32256

Joseph A. McGolthlin  
Vicki Gordon Kaufman  
McWhirter, Grandoff & Reeves  
315 S. Calhoun Street, Suite 716  
Tallahassee, FL 32301

Rick Wright  
AFAD  
Fla. Public Service Commission  
101 East Gaines Street  
Tallahassee, FL 32301

Peter M. Dunbar  
Haben, Culpepper, Dunbar  
& French, P.A.  
306 N. Monroe St.  
P.O. Box 10095  
Tallahassee, FL 32301

Patrick K. Wiggins  
Wiggins & Villacorta, P.A.  
P.O. Drawer 1657  
Tallahassee, FL 32302

Dan B. Hendrickson  
P.O. Box 1201  
Tallahassee, FL 32302

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

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

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

Joseph P. Gillan  
J. P. Gillan and Associates  
P.O. Box 541038  
Orlando, FL 32854-1038

C. Everett Boyd, Jr.  
Ervin, Varn, Jacobs, Odom & Ervin  
305 S. Gadsden Street  
P.O. Drawer 1170  
Tallahassee, FL 32302

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

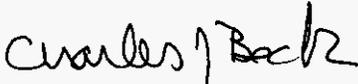
Michael W. Tye  
AT&T Communications of the  
Southern States, Inc.  
106 East College Avenue  
Suite 1410  
Tallahassee, FL 32301

Florida Hotel and Motel Assn.  
c/o Thomas F. Woods  
Gatlin, Woods, Carlson  
& Cowdery  
1709-D Mahan Drive  
Tallahassee, FL 32308

Douglas S. Metcalf  
Communications Consultants, Inc.  
P.O. Box 1148  
Winter Park, FL 32790-1148

Benjamin H. Dickens, Jr.  
Blooston, Mordkofsky, Jackson  
& Dickens  
2120 L Street., N.W.  
Washington, DC 20037

Floyd R. Self  
Messer, Vickers, Caparello,  
Lewis, Goldman & Metz, P.A.  
P.O. Box 1876  
Tallahassee, FL 32302-1876

  
Charles J. Beck  
Deputy Public Counsel