

SIDNEY J. WHITE, JR.
General Attorney

Southern Bell Telephone
and Telegraph Company
Suite 400
150 South Monroe Street
Tallahassee, Florida 32301
(404) 529-5094

ORIGINAL
FILE COPY

August 27, 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. 920260-TL

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Notice of Intent to Request Confidential Classification. Please file this document in the above-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 on the parties shown on the attached Certificate of Service.

ACK
AEA
AFP
CAF
CML
CTD

Sincerely,

Sidney J. White, Jr.
Sidney J. White, Jr.

Enclosures

1 cc: All Parties of Record
A. M. Lombardo
6 H. R. Anthony
R. D. Lackey

RECEIVED & FILED

55 29
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

0928 | AUG 27 83

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 27th day of August, 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, FL 32301-1838
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

Kenneth A. Hoffman
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

Laura L. Wilson, Esq.
c/o Florida Cable Television
Association, Inc.
Post Office Box 10383
310 North Monroe Street
Tallahassee, FL 32302
atty for FCTA

Chanthina R. Bryant
Sprint Communications Co.
Limited Partnership
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

Donald L. Bell, Esq.
104 East Third Avenue
Tallahassee, FL 32303
Atty for AARP

Michael B. Twomey
Gerald B. Curington
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

Sidney J. White (10)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

FILE COPY

In re: Comprehensive Review of)
the Revenue Requirements and Rate)
Stabilization Plan of Southern)
Bell Telephone and Telegraph)
Company)

Docket No. 920260-TL

Filed: August 27, 1993

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

COMES NOW BellSouth Telecommunications, Inc. ("BST") d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), and files its Notice of Intent to Request Confidential Classification.

1. The Staff of the Florida Public Service Commission ("Staff") has issued several Audit Requests in the referenced docket in connection with the NARUC/FCC Regional Audit of BellSouth. The Staff has requested, among other things, that Southern Bell make available for viewing the following information:

2. Audit Request No. 2-122, dated July 26, 1993 - "RE: BellSouth Communications, Inc. (BCI) General F/S and ROI:

- A. Provide BCI financial statements for 1992.
- C. Provide BCI General Ledger, Transaction Ledger, and Detailed Ledger (cumulative for each) for year 1992."

Audit Request No. 2-123, dated July 26, 1993 - "RE: BCI bills to BST:

- B. Provide the back up to the May and October 1992 bills, including but no [sic] limited to:

1. Attachment to invoice which details the total for the month by state separated by reg and nonreg. This attachment should also include the billing before RO1, the RO1 return, the RO1 on taxes and the total billing including RO1.
 2. Provide the summary for the months of May and October 1992, which details each state, all the Companies billed by BCI and the percent billed for each company reg and nonreg.
- E. Provide the balance sheet and I/S used to calculate the RO1 for May and October 1992.
- G. Provide BCI Financial statement for months of May and October 1992."

Audit Request No. 2-125, dated July 26, 1993 - "RE:

BCI - Management fee billings to BCI from BST and BSC. RE: BCI: Management fee billing to BCI from BBS.

- A. What were the total management fees billed to BBS by BSC and BST in 1992? Separate into BSC and BST.
- D. Does BBS bill BCI a management fee? If so, provide the amounts by month BBS bills each of its four subsidiaries for 1992. If so, explain what

type of [sic] being done by BBS for them to bill their four subs."

Audit Request No. 2-127, dated July 26, 1993 - "RE:

BCI - Marketing Time Reporting

D. Provide copies of the following marketing time reporting information that were included in L20-24-14-A-SF:

1. 1992 interview sampling methods and procedures.
2. Translation table.
3. Marketing time reporting, mew [sic] employee information.
4. Part X time reporting for 1992.
5. Internal audit flow chart of marketing time reporting.
6. Copy of internal audit workpaper H-1 which is the 10 questions asked by internal audit of the interviewers. OK to provide copy without answers."

3. Finally, Southern Bell's review of Audit Request No. 2-127 disclosed that it contains information taken directly from internal audit information and reports of internal auditors. Consequently, Southern Bell is also filing this Notice for the portions of Audit Request No. 2-127 that contain such information. As a result, Audit Request No. 2-127 is not being attached hereto with the other copies of the Audit Requests.

4. Some of the information being provided or which was found included in Audit Request No. 2-127 is clearly proprietary. For example, the information contains financial information on non-regulated affiliate companies, billings between non-regulated affiliate companies, cost information on non-regulated affiliate companies and information from internal audits and reports of internal auditors. Such information is specifically considered to be proprietary, confidential business information pursuant to § 364.183(3)(b) and (e), Florida Statutes.

4. Consequently, because this information contains proprietary information, Southern Bell is filing this Notice of Intent to Request Confidential Classification, pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, in order to allow the Staff to review this information without delay. Both the original of this notice and the individual requests have been filed with the Division of Records and Reporting, and a copy has been served on the Division requesting the information. All written Staff Requests, except Audit Request No. 2-127, which is discussed in paragraph 3 above, are attached hereto.

Respectfully submitted this 27th day of August, 1993.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY

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

R. Douglas Lackey
R. DOUGLAS LACKEY
SIDNEY J. WHITE, JR.
4300 - 675 West Peachtree Street
Atlanta, Georgia 30375
(404) 529-5094

Southern Bell Tel. & Tel. Co.
FPSC Docket No. 920260-TL
Audit
Date: 07/26/93
Item No. 2-125
Page 1 of 1

- Request:** **RE:** BCI: Management fee billings to BCI from BST AND BSC.
RE: BCI: Management fee billing to BCI from BBS.
- A. What were the total management fees billed to BBS by BSC and BST in 1992? Separate into BSC and BST.
 - B. What were the total management fees billed to each of the four BBS Companies in 1992 by BST and BSC. Please separate by BST and BSC and by month.
 - C. Please explain the reason for the management fees. What type of work is being done by BST and BSC for them to bill the four BBS Companies.
 - D. Does BBS bill BCI a management fee? If so, provide the amounts by month BBS bills each of its four subsidiaries for 1992. If so, explain what type of being done by BBS for them to bill their four subs.
 - E. Five days after providing us with the above information, provide a representative familiar with this information to answer any questions or clarify any items.

Response:

Date Provided: August 10, 1993

Southern Bell Tel. & Tel. Co.
 FPSC Docket No. 920260-TL
 Audit
 Date: 07/26/93
 Item No. 2-123
 Page 1 of 1

Request: RE: BCI bills to BST:

- A. Provide copies of invoices to BST from BCI for Marketing Services provided for the months of May and October 1992.
- B. Provide the back up to the May and October 1992 bills, including but no limited to:
 1. Attachment to invoice which details the total for the month by state separated by reg and nonreg. This attachment should also include the billing before ROI, the ROI return, the ROI on taxes and the total billing including ROI.
 2. Provide the summary for the months of May and October 1992, which details each state, all the Companies billed by BCI and the percent billed for each company reg and nonreg.
- C. Provide the BCI billing summary to all companies for the year 1992 by month. This would include BST, BSC, BIN, BIS, Dataserv, Inforum, etc.
- D. Provide the nonregulated affiliate rate base formula per C-Letter 19, Section 10, used to calculate the rate base and working capital for the months of May and October 1992.
- E. Provide the balance sheet and I/S used to calculate the ROI for May and October 1992.
- F. Provide sequence 17 reports that correspond to months of May and October 1992.
- G. Provide BCI Financial statement for months of May and October 1992.
- H. How does the ROI that is billed get allocated to reg and nonreg? Provide documentation for this allocation for the months of May and October 1992.
- I. Five days after providing us with the above information, provide a representative familiar with this information to answer any questions or clarify any items.

Response:

Date Provided: August 10, 1993

Southern Bell Tel. & Tel. Co.
FPSC Docket No. 920260-TL
Audit
Date: 07/26/93
Item No. 2-122
Page 1 of 1

Request: RE: BellSouth Communications, Inc. (BCI) General F/S and ROI:

- A. Provide BCI financial statements for 1992.
- B. Provide BCI Chart of Accounts in effect in January, 1992. Provide any changes made in the Chart of Accounts during 1992 through December, 1992.
- C. Provide BCI General Ledger, Transaction Ledger, and Detailed Ledger (cumulative for each) for year 1992.
- D. Does BCI follow Accounting and Finance Committee Bulletin No. 92-8, a guide on rate base and rate of return for nonregulated affiliates in calculating ROI. If not, explain why not and the methodology used.
- E. Explain how ROI was calculated by BCI in 1991 and how calculated in 1992. What are the differences? Why was there a change?
- F. Provide a copy of C Letter 19, Section 10 BellSouth Guide on How to Calculate ROI. How does this differ from Bulletin No. 92-8.
- G. Five days after providing us with the above information, provide a representative familiar with this information to answer any questions or clarify any items.

Response:

Date Provided: August 10, 1993