

J. Phillip Carver General Attorney

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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

August 31, 1993

920260-TL

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 Canus J. Phillip Carver

Enclosures All Parties of Record A. M. Lombardo Harris R. Anthony R. Douglas Lackey WAS _____ OTH _____ **RECEIVED & FILED**

VPSD/UMEN OF RECORDS

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A BELLSOUTH Company

09380 AUG318

DOCUMENT NUMBER-DATE

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CERTIFICATE OF SERVICE Docket No. 920260-TL Docket No. 910163-TL Docket No. 910727-TL Docket No. 900960-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this $3^{15^{+}}$ day of Cuguot, 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 Assoc. 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 Bill L. Bryant, Jr., Esq. Foley & Lardner Suite 450 215 South Monroe Street Tallahassee, FL 32302-0508 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

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

Tallahassee, FL 32399-0863

J.Phillip Conner



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Filed: August 31, 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 Office of Public Counsel ("Public Counsel") issued a Notice of Deposition in the above-referenced docket in order to take the depositions of Southern Bell employees on June 7, 8, 9, 10 and 11, 1993 in Cocoa, Florida. The deposition of Southern Bell employee, David Lobach, who was deposed on June 10, 1993, has been transcribed and was received by Southern Bell on August 30, 1993.

2. Some of the information contained in the deposition is proprietary. Included is information containing, among other things, employee names, home addresses, home phone numbers, and

DOCUMENT NUMBER-DATE

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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, <u>per se</u>, confidential pursuant to Section 364.183(f), Florida Statues, 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, <u>per se</u>, 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. Public Counsel's Notice of Deposition is attached hereto.

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Respectfully submitted this 31st day of August, 1993.

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

K. mu anna HARRIS R. ANTHONY

J. PHILLIP CARVER C/O Marshall M. Criser, III 400 - 150 South Monroe Street Tallahassee, Florida 32301 (305) 530-5555

R. DOUGLAS LACKEY 0))

NANCY B. WHITE 4300 - 675 West Peachtree St. Atlanta, Georgia 30375 (404) 529-5387 08-31-93 01:15PM FROM BELLSOUTH LEGAL-FLA TO 19042228640

P002/005

Attachment

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition on behalf of CITIZENS OF THE STATE OF FLORIDA to initiate investigation into integrity of SOUTHERN) BELL TELEPHONE & TELEGRAPH COMPANY'S repair service activities and reports.

Docket No. 910163-TL June 2, 1993

NOTICE OF DEPOSITIONS UPON ORAL EXAMINATION

TO: Mr. Harris R. Anthony BellSouth Telecommunications, Inc. Suite 1910 150 West Flagler Street Miami, FL 33130

Pursuant to Florida Rule of Civil Procedure 1.310, the Citizens of Florida, by and through Jack Shreve, Public Counsel, will take the sworn depositions upon oral examination of the following employees for the purposes of discovery and such other purposes as are permitted by the Florida Rules of Civil Procedure.

The depositions are scheduled at the following location and times:

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08-31-93 01:15PM FROM BELLSOUTH LEGAL-FLA TO 19042228640 P003/005

<u>Orlando</u>

Monday, June 7 through Wednesday June 9, 1993 7900 Mandarin Blvd. Orlando, FL

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	June 7	<u>June 8</u>	June 9
08:30 a.m.	Hardiman, Joyce	Bush, Annie	Stake, Sara
09:30 a.m.	Jones, Michael D.	McKeand, Allen	Minahan, Robert
10:30 a.m.	Armel, Cynthia	Bilbro, Jan	Brady, Veronica
11:30 a.m.	Lee, Maria D.	Mitchell, Mary	
12:30 p.m.	Lunch	Lunch	
01:30 p.m.	Strait, Julia	Potish, Lawren	ice
02:30 p.m.	Willis, Joy	Walker, Andrew	r
03:30 p.m.	Muniz, Brenda	Davis, Raymond	L

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R=96%

P004/005

Cocoa

Thursday, June 10, 1993 712 Florida Avenue Cocoa, FL

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June 10

- Clark, Mary Ann 08:30 a.m.
- Lobach, David B. 09:30 a.m.
- Elkin, Gail L. 10:30 a.m.

11:30 a.m. Walrath, Dennis L.

Lunch 12:30 p.m.

- Bamber, Steve W. 01:30 p.m.
- Quigg, Stephen O. 02:30 p.m.
- Williams, C. A. 03:30 p.m.
- Wright, Curtiss 04:30 p.m.

RTIFICATE OF SERVICE ocket No. 910163-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 2nd day of June, 1993

Harris R. Anthony, Esq. BellSouth Telecommunications, Inc. d/b/a/ Southern Bell Telephone & Telegraph Company C/o Marshall M. Criser, III 150 S. Monroe Street, Suite 400 Tallahassce, Florida 32301

John Hoag, Esq. Department of Legal Affairs Presidential Circle 4000 Hollywood Ave. 5th Fl., Rm. 10 Hollywood, FL 33021 Tracy Hatch, Esq. Jean Wilson, Esq. Division of Legal Services Fla. Public Service Commission 101 East Gaines Street Tallahassee, FL 32301

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Charles J. Beck Deputy Public Counsel