

SCANNED

J. Phillip Carver  
General Attorney

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

ORIGINAL  
FILE COPY

September 24, 1993

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

920260-TL

Re: Docket No. (900960-TL)

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

- ACK
- AFA
- APP
- CAF
- CMU
- CTR
- EAG
- LEG
- LIN
- OPC
- RCH
- SEC
- WAS
- OTH

Enclosures

cc: All Parties of Record  
A. M. Lombardo  
Harris R. Anthony  
R. Douglas Lackey

RECEIVED & FILED

*MS*

FPSC-BUREAU OF RECORDS

A BELL SOUTH Company

DOCUMENT NUMBER-DATE

10321 SEP 24 83

RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL  
SEE COPY

In re: Show cause proceeding )  
against Southern Bell Telephone )  
and Telegraph Company for )  
misbilling customers. )

Docket No. 900960-TL

Filed: Sept. 24, 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 August 30 through September 2, 1993, in Jacksonville, Gainesville, Daytona Beach, Merritt Island, and Fort Pierce, Florida. The depositions of Southern Bell employee Shelba A. Hartley, who was deposed on August 30, 1993, in Jacksonville, Florida, has been transcribed and was received by Southern Bell on September 23, 1993.

2. Some of the information contained in this 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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FLORIDA RECORDS REPORTING

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 deposition 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 transcript 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.

Respectfully submitted this 24th day of September, 1993.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY

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HARRIS R. ANTHONY

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*R. Douglas Lackey*

R. DOUGLAS LACKEY

NANCY B. WHITE

4300 - 675 West Peachtree St.  
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(404) 529-5387

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Show Cause proceeding against Southern Bell Telephone and Telegraph Company for misbilling customers	)	Docket No. 900960-TL
	)	Filed: August 16, 1993
	)	

NOTICE OF DEPOSITIONS

Pursuant to Florida Rule of Civil Procedure 1.310, notice is provided that the Citizens of Florida, by and through Jack Shreve, Public Counsel, will take the sworn deposition upon oral examination of Shelba Hartley, Aida Stewart, Caroll Muller, Emma Evans, Cindi Booth, Dottie Cruse, Greg Mathis, Betty Buchanon, Sara Brown, Shirley Williams, Elizabeth McKenzie, Martha Powell, Marlene Hughes, Gloria Healey, Dorothy Hall, Linda Hunt, Marsha Stewart, Nancy, Gorniewicz, Donna Johnson and Wanda Futch for purposes of discovery and such other purposes as are permitted by the Florida Rules of Civil Procedure.

The deposition will be taken at the following time and place:

Jacksonville

Monday, August 30, 1993  
 301 West Bay Street, 20th Floor Conference Room C  
Pre-deposition meeting in Conference Room B

- 09:00 a.m. Hartley, Shelba
- 10:00 a.m. Stewart, Aida
- 11:00 a.m. Muller, Caroll
- 01:00 p.m. Evans, Emma
- 02:00 p.m. Booth, Cindi

Gainesville

Tuesday, August 31, 1993  
903 West University Avenue/1st Floor Conference Room  
Pre-deposition meeting in Mr. Christian's 2nd Floor  
Conference Room

- 09:00 a.m. Cruse, Dottie
- 10:00 a.m. Mathis, Greg
- 11:00 a.m. Buchanon, Betty
- 01:00 p.m. Brown, Sara
- 02:00 p.m. Williams, Shirley

Daytona Beach

Wednesday, September 1, 1993  
900 North Nova Road/1st Floor Conference Room  
Pre-deposition check with Wayne Tubaugh in Gloria  
Hart's office

- 09:00 a.m. McKenzie, Elizabeth
- 10:00 a.m. Powell, Martha

Merritt Island

Wednesday, September 1, 1993  
255 North Sykes Creek Parkway/2nd Floor Conference Rm  
Pre-deposition check with Wayne Tubaugh in Ms.  
Bergdoll's office

- 01:30 p.m. Hughes, Marlene
- 02:30 p.m. Heale, Gloria

Fort Pierce

Thursday, September 2, 1993  
3300 Okeechobee Rd./Rm 182 First Floor Conference Rm  
Pre-deposition check with Wayne Tubaugh in Ms.  
McCarthy's office

- 09:00 a.m. Hall, Dorothy
- 10:00 a.m. Hunt, Linda

Fort Pierce (cont.)

11:00 a.m. Stewart, Marsha  
01:00 p.m. Gorniewicz, Nancy  
02:00 p.m. Johnson, Donna  
03:00 p.m. Futch, Wanda

Dated this 16th day of August, 1993.

*Charles J. Beck*  
Charles J. Beck  
Deputy Public Counsel

Office of Public Counsel  
C/O The Florida Legislature  
111 West Madison Street  
Room 812  
Tallahassee, FL 32399-1400  
(904) 488-9330

Attorney 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 16th day of August, 1993.

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*Charles J. Beck*  
Charles J. Beck  
Deputy Public Counsel

**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            day of            , 1993  
to:

Robin Norton  
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