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FILE COPY

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

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. 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.

- ACK \_\_\_\_\_
- AFA 2
- APP 1
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG \_\_\_\_\_
- LIN 6
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1
- VAS \_\_\_\_\_
- OTH Kathin

Sincerely yours,  
*J Phillip Carver*  
J. Phillip Carver

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

RECEIVED & FILED  
*ms*  
EPSC-BUREAU OF RECORDS

A BELL SOUTH Company

DOCUMENT NUMBER-DATE  
10351 SEP 27 1993  
RECORDS/REPORTING

ORIGINAL  
FILE COPY

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: September 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 September 10, 1993 in Jacksonville, Florida. The deposition of Southern Bell employee, C. L. Cuthbertson has been transcribed and was received by Southern Bell on September 23, 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 business addresses and telephone numbers. This information is

DOCUMENT NUMBER-DATE

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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 August, 1993.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY

*Harris R. Anthony*

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*

R. DOUGLAS LACKEY  
NANCY B. WHITE  
4300 - 675 West Peachtree St.  
Atlanta, Georgia 30375  
(404) 529-5387

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  
FILED: September 7, 1993

NOTICE OF DEPOSITION

To: Mr. Harris R. Anthony  
c/o Marshall Criser, III  
BellSouth Telecommunications, Inc.  
(Southern Bell Telephone & Telegraph Co.)  
150 S. Monroe St., Suite 400  
Tallahassee, FL 32301

Pursuant to Florida Rule of Civil Procedure 1.310, the Citizens of Florida, by and through Jack Shreve, Public Counsel, will take the sworn deposition upon oral examination of C. L. Cuthbertson and C. J. Sanders for purposes of discovery and such other purposes as are permitted by the Florida Rules of Civil Procedure. The deposition will be taken at 301 W. Bay Street, 20th Floor, Jacksonville, Florida 32202 on Friday, September 10, 1993, at 10:30 a.m.

*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

**RECEIVED**  
SEP 8 1993

U.S. MAIL - REL. RELATIONS  
TALLAHASSEE, FL

HQ REGULATORY-ATLA  
MIAMI LEGAL  
AMF

PAY \_\_\_\_\_ FED X

**CERTIFICATE OF SERVICE  
DOCKET NO. 920160-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 September, 1993.

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

**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 24th day of September, 1993 to:

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