

FILE COPY SCANNED

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

October 5, 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 Carver*  
J. Phillip Carver *PCW*

1  
6 Enclosures

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

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DIVISION OF RECORDS

A BELLSOUTH Company

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FLORIDA RECORDS/REPORTING

**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  
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

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Tallahassee, FL 32301-1838  
atty for FIXCA

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Wiggins & Villacorta, P.A.  
Post Office Drawer 1657  
Tallahassee, Florida 32302  
atty for Intermedia and Cox

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111 W. Madison Street  
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& Ervin  
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Florida Pay Telephone  
Association, Inc.  
c/o Mr. Lance C. Norris  
President  
Suite 202  
8130 Baymeadows Circle, West  
Jacksonville, FL 32256

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Florida Consumer Action Network  
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Tampa, FL 33609

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Atty for AARP

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Gerald B. Curington  
Department of Legal Affairs  
Room 1603, The Capitol  
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Mr. Douglas S. Metcalf  
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Winter Park, FL 32790-1148

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

J. Phillip Carver (AW)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Handwritten: 10/5/93  
FILE COPY

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: October 5, 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 July 27 through July 31, 1992 in Miami, Riveria Beach, Orlando, Gainesville, Jacksonville, and Fort Lauderdale, Florida. The depositions of the following Southern Bell employees that were taken pursuant to this notice have been transcribed and were received by Southern Bell on October 4, 1993: Clinton G. Smith, John E. Bulko, James J. Canavan, Theodore C. Kellermann, Robert R. Rupe, Roy A. Buford, Donald L. House, John W. Finnegan, Michael G. Myers, John S. Dean, James D. Griffeth, Richard P. Collamati, T. C. Taylor, and John R. Melton.

2. The Office of Public Counsel ("Public Counsel") also issued a Notice of Deposition in the above-referenced docket in

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order to take the depositions of Southern Bell employees on October 14 and 15, 1992 in Fort Lauderdale and Miami, Florida. The deposition of April Ivy, which was taken pursuant to this notice, has been transcribed and was received by Southern Bell on October 4, 1993.

3. Some of the information contained in the depositions listed in paragraphs 1 and 2 above 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 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."

4. 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.

5. Because these depositions contain 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 two Notices of Deposition dated July 21, 1992, and October 7, 1992 are attached hereto.

Respectfully submitted this 5th day of October, 1993.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY

*Harris R. Anthony*  
\_\_\_\_\_  
HARRIS R. ANTHONY *(initials)*

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 *(initials)*

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

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

FILED: October 7, 1992

NOTICE OF DEPOSITION UPON ORAL EXAMINATION

TO: Harris R. Anthony, Esq.  
c/o Marshall M. Criser III  
BellSouth Telecommunications, Inc.  
d/b/a/ Southern Bell Telephone &  
Telegraph Company  
150 S. Monroe Street  
Tallahassee, FL 32301

NOTICE is hereby given that, pursuant to Florida Rule of Civil Procedure 1.310(b)(6), the Citizens of Florida, by and through Jack Shreve, Public Counsel, will take the sworn depositions of the following BellSouth employees as shown on the attached schedule in Miami and Ft. Lauderdale:

Manuel Carreno, Kathy Garguilo, Hilda Geer, April Ivy, Shirley T. Johnson, Margaret Kearse, Dorothy Ketchum, Jeffrey Klink, Mary Klipp, Nicole Maxfield, Scott Mulcahy, Ismael Perera, R. Sattizahn, Prudence Taylor, Dewayne Ward, and Gary Wilson.

The depositions, which are for the purpose of discovery and such other purposes as are permitted by the Florida Rules of Civil Procedure, will cover the customer repair and rebate systems and related matters.

The depositions are scheduled at the following locations and times indicated:

Wednesday, October 14, 1992, at 8:00 a.m.  
Southern Bell Telephone & Telegraph Company  
666 N.W. 79th Ave., room 642  
Miami, Florida

Thursday, October 15, 1992 at 8:00 a.m.  
Southern Bell Telephone & Telegraph Company

6451 N. Federal Hwy., room 1015A  
Ft. Lauderdale, Florida

Dated this 7th day of October 7, 1992.

  
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

Attorney for the Citizens  
of the State of Florida

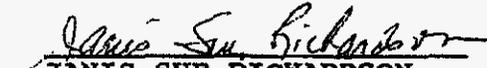
**CERTIFICATE OF SERVICE  
Docket No. 910163-TL**

I HEREBY CERTIFY that the attached NOTICE OF DEPOSITION UPON ORAL EXAMINATION has been served by U.S. Mail or hand-delivery, this 7th day of October, 1992 to the following:

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  
Tallahassee, Florida 32301

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

John Hoag, Esq.  
Department of Legal Affairs  
Presidential Circle  
4000 Hollywood Ave.  
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JANIS SUE RICHARDSON  
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111 West Madison Street  
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