

J. Phillip Carver
General Attorney

ORIGINAL
FILE COPY

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 13, 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. 910163-TL; 900960-TL 020260 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 Confidential Classification, which we ask that you file in the captioned docket.

- ACK _____
- AFA 2 _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG 6 _____
- LIN _____
- OPC _____
- RCH _____
- SEC 1 _____
- WAS _____
- OTH KS _____

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 (sw)
J. Phillip Carver

Enclosures

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

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MS
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A BELL SOUTH Company

DOCUMENT NUMBER-DATE
10986 OCT 13 1993
EPSC-RECORDS/REPORTING

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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 |
| |) | |
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| <hr/> In re: Show cause proceeding against Southern Bell Telephone and Telegraph Company for misbilling customers. |) | Docket No. 900960-TL |
| |) | |
| |) | |
| |) | Filed: Oct. 13, 1993 |

**SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
NOTICE OF INTENT TO REQUEST 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 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 December 17, 1992 in Jacksonville, Florida. The depositions of Cynthia White and David Mower that were taken pursuant to this notice have been transcribed and were received by Southern Bell on October 12, 1993.

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

DOCUMENT NUMBER-DATE
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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 these depositions contain proprietary information, Southern Bell is filing this Notice of Intent to Request 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 dated December 9, 1992 is attached hereto.

Respectfully submitted this 13th day of October, 1993.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY

Harris R. Anthony (PW)

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 (PW)

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

In re: Show Cause Proceeding Against)
Southern Bell Telephone and Telegraph)
Company for Misbilling customers)

Docket No. 900960-TL

Filed: December 9, 1992

NOTICE OF DEPOSITION UPON ORAL EXAMINATION

TO: Harris R. Anthony, Esq.
c/o Marshall M. Criser III
150 S. Monroe Street
Tallahassee, FL 32301

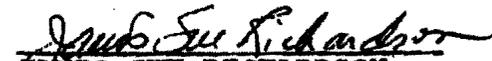
NOTICE is hereby given that, pursuant to Florida Rule of Civil Procedure 1.310(b)(6), the Citizens of Florida, by and through Jack Shreve, Public Counsel, will take the sworn deposition of Ms. Cynthia White and Mr. David Mower.

The deposition, which is for the purpose of discovery and such other purposes as are permitted by the Florida Rules of Civil Procedure, will cover the matters related to the issues in these dockets. Mr. David Mower is requested to produce the names of those persons disciplined by him or in his presence at the deposition.

The deposition is scheduled at the following location and times indicated:

Thursday, December 17, 1992 at 10:00 a.m. and 11:30 a.m.
Southern Bell Telephone and Telegraph Co. Offices
301 W. Bay Street, 20th Floor
Jacksonville, Florida 32202

Dated this 9th day of December 1992.


JANIS SUE RICHARDSON
Associate Public Counsel

Office of Public Counsel
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111 West Madison Street
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Tallahassee, Florida 32399-1400

(904) 488-9330

Attorney for the Citizens
of the State of Florida

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 *13th* day of *Oct.*, 1993
to:

Robin Norton
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Tallahassee, FL 32399-0866

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L. Phillip Carver (aw)