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ORIGINAL
FILE COPY

October 28, 1993

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

920260-TL

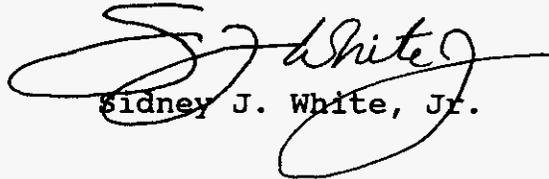
Re: Customer Contact Sales Audit/Undocketed

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Request for Confidential Classification. Please file this document in the above-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 on the parties shown on the attached Certificate of Service.

Sincerely,


Sidney J. White, Jr.

Enclosures

cc: All Parties of Record
A. M. Lombardo
H. R. Anthony
R. D. Lackey

DOCUMENT NUMBER-DATE
11683 OCT 28 83
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Customer Contact)
Sales Audit)
_____)

Undocketed

Filed: October 28, 1993

BE COPY

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION

COMES NOW BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), pursuant to Rule 25-22.006, Florida Administrative Code, and files its Request for Confidential Classification for certain information contained in Staff's Customer Contact Sales Audit Report and audit workpapers.

1. During 1993, Staff conducted audit field work relating to its "Customer Contact Sales" Audit. Staff has now completed its field work relating to these efforts.

2. On October 11, 1993, Staff allowed Southern Bell to review certain documents and information that it desired to include in its audit workpapers to support its audit. Subsequently, on October 22, 1993, Staff submitted a copy of its Final Audit Report to Southern Bell. These events afforded the Company the opportunity to review the workpapers and audit report to determine if they included any proprietary confidential business information.

3. Pursuant to Rule 25-22.006(3)(a) and (4), Florida Administrative Code, Southern Bell is hereby filing its Request for Confidential Classification for certain portions of Staff's

Customer Contact Sales Audit Report and for certain information contained in the corresponding audit workpapers. These documents contain findings, excerpts and quotes taken directly from Southern Bell's internal audit reports.

4. Attachment A is a listing showing the location in the subject documents of the information designated by Southern Bell as confidential.

5. Attachment B contains two edited copies of the subject documents with the confidential information deleted.

6. Attachment C is a sealed package containing copies of the subject documents with the material which is confidential and proprietary highlighted. Copies of Attachment C are not being served on the other parties in this proceeding.

7. With respect to the information contained both in the Staff's audit report and workpapers for the Customer Contact Sales Audit, which are referenced in Attachment A as including information derived from internal audit reports and findings and conclusions contained in such reports, this information is entitled to confidential classification. Such information is expressly deemed to be proprietary confidential business information pursuant to Section 364.183(3)(b), Florida Statutes. Southern Bell has identified only the portions of the audit report and workpapers which make reference to, or directly quote from, these internal audit findings, conclusions and related information and request that this information as indicated be classified as confidential information, and therefore exempt from

the inspection and examination provisions of Section 119.07(1)(a), Florida Statutes. Since the reports of internal auditors are deemed to be proprietary confidential business information, it logically follows that excerpts taken directly from such reports relating to the findings, conclusions and recommendations are similarly entitled to the same protection from public disclosure.

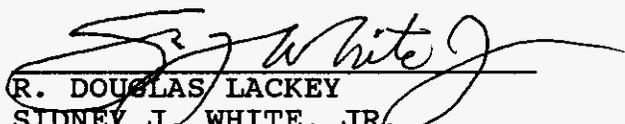
8. Southern Bell has treated and intends to continue to treat the material for which confidential classification is sought as private, and this information has not been generally disclosed.

WHEREFORE, based on the foregoing, Southern Bell moves the Prehearing Officer to enter an order declaring the information described above and contained in the indicated portions of the attachments to be proprietary confidential business information, and thus not subject to public disclosure.

Respectfully submitted this 28th day of October, 1993.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY


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SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY
REQUEST FOR CONFIDENTIAL CLASSIFICATION

FPSC STAFF'S CONTACT SALES AUDIT (UNDOCKETED)
OCTOBER 1993

JUSTIFICATION FOR CONFIDENTIALITY REQUEST

1. This information includes findings conclusions which relate to, and quote directly from portions of southern Bells an internal audits and workpapers. Accordingly, this information from internal audits is entitled to confidential treatment under the express provisions of Section 364.183(3)(b), Florida Statutes.

The following information identified by page and line numbers is considered confidential and proprietary:

<u>DOCUMENT</u>	<u>PAGE NO.</u>	<u>LINE NOS.</u>	<u>REASON PROPRIETARY</u>
AUDIT REPORT	31	9, 10	1
	37	3-6, 7-9, 14-19	1
	41	11, 12	1
WORK PAPERS	1	7-18, 20-23	1
	2	3-11, 13-25	1
	3	3-9	1