

J. Phillip Carver  
General Attorney

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NOV 5 1993

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

November 5, 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. 900960-TL  
920960-TV

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Notice of Intent to Request for Confidential Classification, which we ask that you file in the captioned docket.

ACK  A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me.  
AFA  Copies have been served to the parties shown on the attached  
APP  Certificate of Service.

CAF

CMU

CTR

EAG

LEG

LIN

OPC

ROH

SEC

WAS

OTH

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

Enclosures

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

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FPSC-BUREAU OF RECORDS

A BELLSOUTH Company

DOCUMENT NUMBER-DATE

11974 NOV-5 93

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**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

Charles J. Beck  
Deputy Public Counsel  
Office of the Public Counsel  
111 W. Madison Street  
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Tallahassee, FL 32399-1400

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Florida Public Svc. Commission  
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Limited Partnership  
3065 Cumberland Circle  
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Florida Pay Telephone  
Association, Inc.  
c/o Mr. Lance C. Norris  
President  
Suite 202  
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Gerald B. Curington  
Department of Legal Affairs  
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Angela Green  
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Stan Greer  
Division of Communications  
Florida Public Svc. Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0863

J. Phillip Carner, III

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Show cause proceeding ) Docket No. 900960-TL  
against Southern Bell Telephone )  
and Telegraph Company for )  
misbilling customers. )  
\_\_\_\_\_ ) Filed: November 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 August 30 through September 2, 1993 in Jacksonville, Gainesville, Daytona Beach, Merritt Island, and Fort Pierce, Florida. The depositions of Southern Bell employees Aida Stewart, Cindi Booth, Carol Muller, and Emma Evans, who were deposed on August 30, 1993, in Jacksonville, Florida, have been transcribed and were received by Southern Bell on November 4, 1993.

2. Some of the information contained in these depositions is proprietary. Included is information containing, among other

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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."

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 information 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 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 is attached hereto.

Respectfully submitted this 5th November, 1993.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY

*Harris R. Anthony* / AB

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* / AB

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: 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, Carol Muller, Emma Evans, Cindi Booth, Dottie Cruse, Greg Mathis, Betty Buchanan, 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, Carol  
01:00 p.m. Evans, Emma  
02:00 p.m. Booth, Cindi

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U.S. MAIL - REG. RELATIONS  
TALLAHASSEE, FL  
1 HQ REGULATORY-ATLA  
MIAMI LEGAL  
AML  
FAX \_\_\_\_\_ FED X ✓

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. Healey, 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

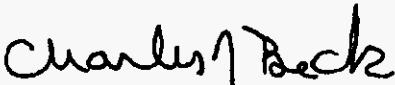
09:00 a.m. Hall, Dorothy  
10:00 a.m. Hunt, Linda



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  
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