MANCY B. WHITE General Attorney

Southern Bell Telephone and Telegraph Company Suite 400 150 South Monroe Street Tallahassee, Florida 32301 (404) 529-5387



June 16, 1995

Ms. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399

920260

RE: Undocketed Matter - FPSC Surveillance Audit

Dear Ms. Bayo:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Notice of Intent to Request Confidential Classification. Please file this document in the captioned matter.

A copy of this letter is exclosed. Please mark it to indicate that the original was filed and return the copy to me.

Sincerely,

Mancy B. White

Enclosures

cc: A. M. Lombargo

R. G. Beatty

R. D. Lackey



DOCUMENT NUMBER-DATE

05668 JUN 168

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re:	FPSC Surveillance Audit)				
)	Filed:	June	16,	1995
		1				

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 Staff of the Florida Public Service Commission has issued several data requests to Southern Bell in connection with the Surveillance Audit. Staff requests, among other things, that Southern Bell furnish the following information:
- 2. Staff Audit Request No. 13 dated June 9, 1995 Item No. 1 - "Please provide all management letters that were referred to in the internal audits for florida and Headquarters for the periods 1993 and 1994."
- 3. Staff Audit Request No. 14 dated June 9, 1995 "Per conversations with Karol Hoffman, in Audit #W40-16-45-A-SF, a statement is made referring to a second run and errors in the reporting proce__ data. Please state whether the statement is referring to service order errors or what and explain this audit criticism with reference to these errors."
- Staff Audit Request No. 16 dated June 12, 1995 "Re
 Internal Audit V40-22-38-A-S 12/94 Purchasing CO Switch Equipment
 (a) The audit reveals that over 1.5 million in credits due BST

DOCUMENT NUMBER-DATE

05668 JUN 16 8

Florida and Georgia were uncovered, (b) How much in Florida?

Were the credits booked in '94? If so, what accounts and in what amounts? Provide copies of journal entries. If not, when will they be booked, into what accounts and amounts?, (c) If not booked in '94, are any of these credit amounts an adjustment to the Surveillance Report year end '94?"

- 5. Staff Audit Request No. 17 dated June 12, 1995 "Re: Internal Audit V40-42-10-A-SF 12/94 Development & Distribution of Overheads (a) Provide copy of Classification Letter 10-06 (b) Do audit results mean that overhead rates used in all 1994 were based on data from January to August 1992? (c) Have there been rates calculated for 94 based on 93 data as required in Classification Letter 10-06? (d) If so, supply rates used in 94 and rates calculated on 93 data to apply to 94 (e) Has an analysis been done to determine the impact of using overhead rates based on 92 data as opposed to using overhead rates based on 93 data? If so, provide. If not, explain why not, (f) Please list all overhead rates applied in 94 based on 92 data, (g) Please list, if calculated, all overhead rates that would have been applied in 94 based on 93 data."
- 6. Staff Audit Request No. 18 dated June 12, 1995 "Re: V-40-26-45-A-S April 94 Employee Expense Settlements - Please provide Internal Audit Workpapers for the above audit in the Miami office for our review."
- 7. The information requested includes internal audit information. Such information is specifically considered to be proprietary, confidential business information pursuant to

§ 364.183(3) and (3)(b), Florida Statutes.

8. Consequently, because this information contains proprietary information, Souther: Bell is filing this Notice of Intent to Request Confidential Classification, pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, in order to allow the Staff to review this information without delay. Both the original of this notice and the individual requests have been filed with the Division of Records and Reporting, and a copy has been served on the Division requesting the information. The written Staff requests are attached hereto.

Respectfully submitted this 16th day of June, 1995.

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

ROBERT G. BEATTY

c/o Nancy Sims 400-150 South Monroe Street Tallahassee, Florida 32301 (305) 347-5561

NANCY BJWHITE

4300 SBC - 675 W. Peachtree St.

Atlanta, Georgia 30375

(404) 529-5387

Unury: Sup T	1: 101
FROM: BUTH YOUR (*	(AUDITOR PRE-ARRIO ESCURSI)
REQUEST NUMBER: 13 DATE C	F REQUEST: 6/9/95
REQUEST THE FOLLOWING STEM(S) BE PROVIDED BY	6/15/95
REFERENCE RULE 25-22.004, F.A.C., THIS REQUEST IS MADE:	O INCIDENT TO AN INQUIRY OUTSIDE OF AN INQUIRY
Please Orovido all ma	- 222 P 0:11
that was integrable to	the in tend
40 Alice 1993	1907 4
TO: AUDIT MANAGER	DATE
SM 등 전통 전통 전통 전투 전 기계를 통해 되었다면 하는 사람들은 경험 전 이 등 경기 (1) 보이지 않는 것이다.	
THE REQUESTED RECORD OR DOCUMENTATION:	
THE REQUESTED RECORD OR DOCUMENTATION: (1) HAS BEEN PROVIDED TODAY,	
(1) O HAS BEEN PROVIDED TODAY,	UT WILL BE MADE AVAILABLE BY
(1) O HAS BEEN PROVIDED TODAY. (2) O CANNOT BE PROVIDED IN THREE (3) WORK DAYS B	
(1) O HAS BEEN PROVIDED TODAY,	IS PROPRIETARY AND IN 364.183, 366.093, OR 367.186, F.S. TO OF THIS MATERIAL. THE UTILITY OR OTHER TEXT CONFERENCE, FILE A REQUEST FOR
(1) O HAS BEEN PROVIDED TODAY. (2) CANNOT BE PROVIDED IN THREE (3) WORK DAYS BY (3) O'ND IN MY OPINION, THE MATERIAL IN ITEM NOS CONFIDENTIAL BUSINESS INFORMATION AS DEFINE MAINTAIN CONTINUED CONFIDENTIAL HANDLING HERSON MUST, WITHIN 21 DAYS AFTER THE AUDI CONFIDENTIAL CLASSIFICATION WITH THE DIVISION	IS PROPRIETARY AND D IN 364.183, 366.093, OR 367.156, F.S. TO OF THIS MATERIAL. THE UTILITY OR OTHER T EXIT CONFERENCE, FILE A REQUEST FOR N OF RECORDS AND REPORTING. REFER TO
(2) CANNOT BE PROVIDED IN THREE (3) WORK DAYS BE (3) O IN MY OPINION, THE MATERIAL IN ITEM NOS CONFIDENTIAL BUSINESS INFORMATION AS DEFINE MAINTAIN CONTINUED CONFIDENTIAL HANDLING HERSON MUST, WITHIN 21 DAYS AFTER THE AUDI CONFIDENTIAL CLASSIFICATION WITH THE DIVISION RULE 25-22,006, F.A.C.	IS PROPRIETARY AND ED IN 364.183, 366.093, OR 367.156, F.S. TO OF THIS MATERIAL. THE UTILITY OR OTHER TEXT CONFERENCE, FILE A REQUEST FOR N OF RECORDS AND REPORTING. REFER TO

SHETELSUTTION:
White; Utility Complete and Return to Auction
Pink: In Prise Anabet
Goldburget: Auction
Comment: Auction
Comment: Auction
Comment: Eliter Studies

SONATURE AND TILL OF REPORTERS

FIGUREAG PRIN. 674

O: Putt	· Kleen	China	Holman
ROM:	mily minassi)	DATE OF REQU	PARTICIA PROPERTY SECURITY
REQUEST N'IMB AUDIT PURHOSE REQUES	The free of the second of the		6/20/95
REFEREN	ICE RULE 25-22.006, F.A.C., THIS REQ	UEST IS MADE:	INCIDENT TO AN INQUIRY
TEM DESCRIPTION	HW40-16-45-A.	si with Ka	we Hoffman,
The last	reporting purcess	date	Please state
order a	none a what	+ molson	77 Min
***************************************	watered was the	general is a	WOOD WITH THE
	Mice Maria	from 15 1	
		promite As A	
TO: AUDIT MAI	AGER	product to a	DATE
THE REQUESTE	RECORD OR DOCUMENTATION: HAS BEEN PROVIDED TODAY.	grand. As A	DATE
THE REQUESTE	RECORD OR DOCUMENTATION:	B) WORK DAYS BUT WIL	
(1) (2)	AND IN MY OPINION, THE MATERIA CONFIDENTIAL BUSINESS INFORMATIAN CONFIDENTIAL BUSINESS INFORMATIAN CONFIDENTIAL BUSINESS INFORMATIAN CONTINUED CONFIDENTIAL BUSINESS INFORMATIAL BUSINESS INFORMATIAN CONTINUED CONFIDENTIAL BUSINESS INFORMATIAN CONFIDENTIAL BUSINESS INFORMATIAN CONTINUED CONFIDENTIAL BUSINESS INFORMATIAN CONTINUED	ALIN ITEM NOS ATION AS DEFINED IN MILL HANDLING OF THE AFTER THE AUDIT EXIT	
THE REQUESTE	AND IN MY OPINION, THE MATERIAL CONFIDENTIAL BUSINESS INFORMATION CONFIDENTIAL BUSINESS INFORMATION CONFIDENTIAL BUSINESS INFORMATION CONFIDENTIAL CLASSIFICATION WE RULE 25-22.006, F.A.C.	ALINITEM NOS. ATION AS DEFINED IN MILL HANDLING OF THE AUDIT EXIT AFTER THE AUDIT EXIT WITH THE DIVISION OF R	IS PROPRIETARY ASSAULTED IS PROPRIETARY ASSAULTED IS PROPRIETARY ASSAULTED IN PROPRIETARY ASSAUL

F3C/MA-4 (See. 6/7

TO: Patte Kl	en Y D		
REQUEST NUMBER: 16 AUDIT PURPOSE:	Sumillance	DATE OF REQUEST:	6 12 95
	OWING MEM(S) BE PROVIDED I	_	DATE DATE
The could be the second of the county of the	Antemo and Purlacing Co Angle Hat La George	×	SIDE OF AN INQUIRY SIDE OF AN INQUIRY A-S 12/94 LON A CLEDITO CON AN CLEDI
Mont board augustn	din 94 au a	walled rep	4 amounts:
THE REQUESTED RECORD (1) HAS BEEN	OR DOCUMENTATION: PROVIDED TODAY.		
(2) O CANNOT	BE PROVIDED IN THREE (3) WO	RK DAYS BUT WILL BE MAD	E AVAILABLE BY
MAINTAIN PERSON / CONFIDER	Y OPINION, THE MATERIAL IN IT NTIAL BUSINESS INFORMATION I CONTINUED CONFIDENTIAL : MUST, WITHIN 21 DAYS AFTER NTIAL CLASSIFICATION WITH TH 2,006, F.A.C.	AS DEFINED IN 364,183, HANDLING OF THIS MATE THE AUDIT EXIT CONFER	366.093, OR 367.156, F.S. TO RIAL, THE UTILITY OR OTHER ENCE, FILE A REQUEST FOR
(4) O THE ITEM Y	WILL NOT BE PROVIDED. (SEE A	TACHED MEMORANDUM	1
BRITISBUTION: Writing utility Complete and Saturn to Pinic IC '95C Analysi Gelderwall Augli No Copy	is Audior	EQHANES AND	TOCANA-A PON. 6/94

TO: _ Pa	the Kley	N,				
UTILITY:	BATO	1	96.8			
FROM:	puel work	Joun /	104	- CAN	OTICA PERPANA MICH	ten
REQUEST NUMB	_	7 - 61 1		-	11.	
AUDIT PURPOSE	STATE OF THE PARTY	Junelle	nue DAI	TE OF REQUES	1:	7
		NG ITEM(S) BE PRO	CADED BY		6/2/10	87/75
					PERMI	7,
REFEREN	NCE RULE 25-22	2006, F.A.C., THIS I	REQUEST IS MAD	e C) INCIDENT TO	AN INQUIRY
				Č	OUTSIDE OF A	W MOURY
ITEM DESCRIPTION	ONE DO	b. 00 .	1 11.6 4			. /
E - WILHESTELL	NE GO	and wed	1 440-4	2-10-A	-SF , K	794
D. Pour la	Can d	Copper.	the land	then /	Overter	ر الحال
THE POWER	A 19	carrie	alien. Nell	0-10-00		7.00000
8) Do and	il Moss	It men.	that H	1 Breeze	lead by	(-2
used &	n all 1	1994 m	and buse	ion a	ate dur	M
munian	to ale	sent 1990	B. STOLLINE	and the last	0	•
- V	•	U		F	PELLASY.	
CT HITTER COR	u been	rutes cal	laulstil	m 94 a	road on 4	3 data
DO MA	min	Chemier	lun le	the 10-1	7.30	-07-6
D) 20 00 0	The state of the	Die	an Hard	44 4	Autos	culculated
AN 1300	an in wh	the to git				
TO: AUDIT MAN	AAtto					
IO. AUDII MAN	LAGER			-	DATE	
THE REQUESTED	RECORD OR	DOCUMENTATION				
		OVIDED TODAY.				
~						
4 O	CANNOT BE P	ROVIDED IN THRE	E (3) WORK DAY	YS BUT WILL BE	MADE AVAILA	BLE BY
(3)	AND IN MY O	DINION THE MATE	DIAL IN TENA NO		10 0	ROPRIETARY AND
., 0	CC IDENTIA	L BUSINESS INFOR	MATION AS DE	ENED IN 344	183 344 003 0	OR 367.156, F.S. TO
						UTILITY OR OTHER
						E A REQUEST FOR
			WITH THE DIVE	SION OF REC	ORDS AND REP	ORTING. REFER TO
	RULE 25-22.00	6, F.A.C.				
					E. San	
141	THE HEM WILL	NOT BE PROVIDE	D. ISEE ATTACH	ED MEMORAN	(MUD)	
AV-14			TARK			
	Salah Balan					

SCETTERSUTTORIC
White Utility Complete and Relum to Audior
Prist to RSIC Analysi
Gostomerod: n. xit has Copy
Commy, Utility Restan

SIGNATURE AND TITLE OF RESPONDENT

10: Patte Elen	
UTILITY: BAPO	,
FROM: puor monden	HARDECH PREPARING RIGHERS
REQUEST NUMBER: 17 pg 212	DATE OF REQUEST: 6/19
AUDIT PURPOSE: 1 Quincillar	brite of recording
REQUEST THE FOLLOWING ITEM(S) BE PROVIDED	DBY
REFERENCE RULE 25-22.006, F.A.C., THIS REQUES	T IS MADE: INCIDENT TO AN INQUIRY
	POUTSIDE OF AN INQUIRY
ITEM DESCRIPTION:	•
E) Had on anolysis her	a hein done to
delerine the planet of	using greekend rutes
- Migest on 92 date cent	opposed to using
M 80 MOUNTED MARIE	the state when a tr
7	1. Defende
F) flens fit all arendered	rate applied in 44
most based on 92da	E
(5) Plan 12 Vid 1 100 01	0 00 = 1 0 0 0
world home been a little to	94 band on 93 data.
A CONTROL OF THE PARTY OF THE P	11 20000
TO: AUDIT MANAGER	DATE
THE REQUESTED RECORD OR DOCUMENTATION:	
(1) HAS BEEN PROVIDED TODAY.	
(2) CANNOT BE PROVIDED IN THREE (3) W	ORK DAYS BUT WILL BE MADE AVAILABLE BY
(3) O AND IN MY OPINION, THE MATERIAL IN	ITEM NOS IS PROPRIETARY AND
MAINTAIN CONTINUED CONFIDENTIAL	N AS DEFINED IN 364.183, 366.093, OR 367.156, F.S. TO HANDLING OF THIS MATERIAL. THE UTILITY OR OTHER
	IR THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR
CONFIDENTIAL CLASSIFICATION WITH T	THE DIVISION OF RECORDS AND REPORTING, REFER TO
RULE 25-22.006, F.A.C.	
(4) THE ITEM WILL NOT BE PROVIDED. (SEE	ATTACHED MEMORANDUM
Daylayron	8. 3 1 2 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
Write Willy Complete and Beturn to Auditor Pick to FrisC Analysi	SIGNATURE AND STLE OF RESPONDENT

- PM	· Ho.		
TO: fall	BUTO		
FROM:	till pune	Report of	
	DUIDE MANAGER U	T	MATERIA PREPARAGE REQUESTS
REQUEST NUMB	The state of the s	_ DATE OF RE	QUEST: 6/14/55
AUDIT PURPOSE	SEP-SECT ALL SECTION SERVICES SERVICES SERVICES AND ADMINISTRATION OF THE PROPERTY OF THE PROP		1 1 1
REQUES	THE FOLLOWING ITEM(S) BE PROVI	DED BY	GAIN 0/27/95
REFEREN	NCE RULE 25-22.006, F.A.C., THIS REG	NIET IS MADE	O BUCKERS TO ALLE STUDIO
		IOLAI IS HOUSE	O INCIDENT TO AN INQUIRY
ITEM DESCRIPTI	ONE		QUESTIDE OF AN INQUIRY
	CV 40-26-43-1	15 Kg	2 94
	inglance upo	mo state	wile
- 0.			
PI	les provide dete	and and	2 Withouse)
- =	on the above andel	Hillian St. St. Co. Co. Co. Co. Co. Co. Co. Co. Co. Co	Can Miles
- 4	a pur rement.	THE TAXABLE SV	(10)
	Read and the second second second	Section And April 1997	
的 包含化 50%			
TO: AUDIT MAN	AGER		DATE
		Hall Ashresson	DAIE
THE REQUESTED	RECORD OR DOCUMENTATION:		
m O	HAS BEEN PROVIDED TODAY.		
m (
40	CANNOT BE PROVIDED IN THISE (9)	WORK DAYS BUT W	ILL BE MADE AVAILABLE BY
(3)	AND IN MY OPINION THE MATERIAL	SUPERIOR	IS PROPRIETARY AND
	CONFIDENTIAL BUT NESS INFORMAT	DON AS DERNED IN	S PROPRIETARY AND 364.183, 366,093, OR 367.156, F.S. TO
	MAINTAIN CONTINUED CONFIDENT	TAL HUNDLING OF	THIS MATERIAL, THE UTILITY OR OTHER
	PERSON MUST, WITHIN 21 DAYS A	FTER THE AUDIT EX	T CONFERENCE, FILE A REQUEST FOR
	CONFIDENTIAL CLASSIFICATION WIT	TH THE DIVISION OF	RECORDS AND REPORTING, REFER TO
	RULE 25-22.006, F.A.C.		
(4)			
170	THE ITEM WILL NOT BE PROVIDED, (S	SE ATTACHED MEMO	DRANDUM)
Destaurion:			GRATURE AND TITLE OF EMPONDENC
Pris to FPEC Analysi	e and Return to Auditor		- The same of the