# JACK SHREVE

PUBLIC COUNSEL

#### STATE OF FLORIDA

#### OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, Florida 32399-1400 904-488-9330

April 26, 1993

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FFBC-RECGROS/REPORTING

Steve Tribble, Director Division of Records and Reporting Florida Public Service Commission 101 East Gaines Street Tallahassee, FL 32399-0850

Re: Docket No. (910163-TL)

Dear Mr. Tribble:

Enclosed for filing in the above-captioned proceeding on behalf of the Citizens of the State of Florida are the original and 15 copies of Citizens' Response and Opposition to Southern Bell's Motion for a Permanent Protective Order.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Enclosure	ACK 1 AFA 1 APP CAT	Sincerely,  Actives J. Book  Charles J. Beck  Deputy Public Counsel
ALCOTTED & FILED	WICH promoters	DOCUMENT MUNICER-DATE

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the )
Integrity of Southern Bell's )
Repair Service Activities and )
Reports )

Docket No. 910163-TL Date filed: April 26, 1993

## CITIZENS RESPONSE AND OPPOSITION TO SOUTHERN BELL'S MOTION FOR A PERMANENT PROTECTIVE ORDER

The Citizens of Florida ("Citizens"), by and through Jack Shreve, Public Counsel, oppose the motion for a permanent protective order filed by BellSouth Telecommunications, Inc., d/b/a/ Southern Bell Telephone and Telegraph Company ("Southern Bell") on April 16, 1993, as amended on April 21, 1993. Specifically, we oppose each request for confidentiality of employee information ("reason 2" in Southern Bell's motion) for the reasons set forth in our opposition to Southern Bell's request for a temporary protective order filed on March 10, 1993.

WHEREFORE, the Citizens oppose Southern Bell's request for a permanent protective order.

Respectfully submitted,

Jack Shreve Public Counsel

Charles J. Beck Deputy Public Counsel

Janis Sue Richardson Associate Public Counsel

Aus Du Cilandson

Office of Public Counsel c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, FL 32399-1400

(904) 488-9330

Attorneys for the Citizens of the State of Florida

### CERTIFICATE OF SERVICE DOCKET NO. 910163-TL

I HEREBY CERTIFY that a correct copy of the foregoing has been furnished by U.S. Mail or hand-delivery to the following persons on this 26th day of April, 1993.

Marshall Criser, III
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Inc. (Southern Bell Telephone & Telegraph Co.)
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Tallahassee, FL 32301

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