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ORIGINAL
FILE COPY

August 27, 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. 920260-TL

Dear Mr. Tribble:

Enclosed is an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Motion for a Temporary Protective Order for its Response to Public Counsel's Thirty-First Request for Production of Documents. 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.

ADY ✓
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SEC /
WAS
QTH

Sincerely,

Nancy B. White (01)
Nancy B. White

Enclosures

1 w/m
6 cc: All Parties of Record
A. M. Lombardo
H. R. Anthony
R. D. Lackey

RECEIVED & FILED

[Signature]
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
09284 AUG 27 93

CERTIFICATE OF SERVICE

Docket No. 920260-TL

Docket No. 900960-TL

Docket No. 910163-TL

Docket No. 910727-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 27th day of August, 1993 to:

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Nancy B. White
(07)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of)
the Revenue Requirements and Rate) Docket No. 920260-TL
Stabilization Plan of Southern)
Bell Telephone and Telegraph) Filed: August 27, 1993
Company)

ORIGINAL
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SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
MOTION FOR A TEMPORARY PROTECTIVE ORDER
FOR ITS RESPONSE TO PUBLIC COUNSEL'S
THIRTY-FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

COMES NOW, BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), and files pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, its Motion for Temporary Protective Order.

1. On October 22, 1992, the Office of Public Counsel ("Public Counsel") served upon Southern Bell its Thirty-First Request for Production of Documents in the above captioned matter, as well as in Docket Nos. 910163-TL and 900960-TL. Within that request for documents were Items 10, 11, and 12, which requested, among other things, documents provided to the Attorney General or Statewide Prosecutor. Southern Bell objected to providing these documents and Public Counsel filed its Fourteenth Motion to Compel. Southern Bell, in settlement of Public Counsel's Motion to Compel, provided Public Counsel with access to the documents. Public Counsel requested copies of certain of the documents. Southern Bell considers this information to be proprietary and confidential business information pursuant to § 364.183, Florida Statutes inasmuch as it contains employee names, home addresses and telephone numbers.

2. Pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, Southern Bell moves the Prehearing Officer to issue a Temporary

Protective Order exempting the portions of the Company's response to the Thirty-First Request for Production of Documents, Item Nos. 10, 11, and 12 from § 119.07(1), Florida Statutes.

3. If Public Counsel subsequently notifies Southern Bell that this proprietary information is to be used in a proceeding before this Commission, Southern Bell will, in accordance with Rule 25-22.006(5)(c), Florida Administrative Code, file a detailed Motion for Protective Order specifically addressing the information identified.

4. With respect to Southern Bell's response to the above enumerated item, the information requested is information of a proprietary confidential business nature. Such information is expressly exempt from the public inspection and examination provisions of § 119.07(1), Florida Statutes pursuant to § 364.183, Florida Statutes.

5. All of the information for which Southern Bell requests confidential treatment is intended to be treated as confidential, has been treated as confidential and has not been disclosed to any third party except pursuant to statutory provisions or private agreement that provides that the information will not be released to the public.

WHEREFORE, Southern Bell respectfully requests that the Prehearing Officer issue a Temporary Protective Order exempting portions of Southern Bell's responses to Public Counsel's Thirty-First Request for Production of Documents from § 119.07(1), Florida

Statutes, in accordance with Rule 25-22.006, Florida Administrative Code.

Respectfully submitted this 27th day of August, 1993.

SOUTHERN BELL TELEPHONE
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