

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:)
)
 Petition by ICG TELECOM GROUP, INC.)
 for Arbitration of an Interconnection)
 Agreement with BELLSOUTH)
 TELECOMMUNICATIONS, INC. Pursuant to)
 Section 252(b) of the Telecommunication)
 Act of 1996)
 _____)

ORIGINAL

Docket No. 990691-TP

Filed: September 20, 1999

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**ICG TELECOM GROUP, INC.'S
 REQUEST FOR PROTECTIVE ORDER**

Pursuant to Rule 25-22.006, ICG Telecom Group, Inc. (ICG) requests the entry of a Protective Order, and in support states:

1. On August 31, 1999, BellSouth Telecommunications, Inc. (BellSouth) propounded its First Set of Interrogatories on ICG.
2. Items 17, 19, and 27 request information which ICG regards as proprietary and confidential business information. The information will be provided to BellSouth under the terms of a Confidentiality Agreement between the parties. This request is designed to shield the information when it is made available to Staff.
3. Item 17 requests information regarding negotiations of volume and term discounts between ICG and other ILECs.

4. Item 19 asks for information regarding the number of access lines being served by ICG in each state in which it does business.

5. Item 27 asks for information regarding specific frame relay elements ICG has requested from BellSouth.

6. All of the information sought in these three items is sensitive, and of commercial

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 CMU Teodoro
 CTR _____
 EAG _____
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value. Negotiations with BellSouth and other ILECs are conducted on a confidential basis. Release of the information on access lines would prejudice ICG in the marketplace by providing insight into its level of activity and business strategy. ICG carefully guards such information.

WHEREFORE, ICG requests entry of a Protective Order, exempting the described information from Section 119.07, Florida Statutes, and further shielding it from disclosure.


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Attorneys for ICG Telecom Group, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy ICG Telecom Group, Inc.'s Request for Protective Order by hand-delivery* this 20th day of September, 1999 to:

*Lee Fordham
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Gunter Building, Room 370
Tallahassee, FL 32399

*Nancy B. White
*Michael P. Goggin
c/o Nancy Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301



Joseph A. McGlothlin