NANCY B. WHITE General Counsel - Florida

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (305) 347-5558



April 26, 2000

Mrs. Blanca S. Bayó Director, Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: 991378-TL (Show Cause Docket)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion for a Temporary Protective Order, which we ask that you file in the above-captioned matter.

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 to the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White

NBW/vf

OPG RRR

SEC

cc: All parties of record Marshall M. Criser III

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

95451 APR 268

FPSC-RECORDS/PEPORTING

## CERTIFICATE OF SERVICE Docket No. 991378-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Hand Delivery this 26th day of April, 2000 to the following:

Walter D'Haeseleer, Director Division of Communications Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Donna Clemons, Staff Counsel Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

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
Attorney for the Citizens
of the State of Florida

Nancy B. White

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Initiation of show cause ) proceedings against BellSouth ) Telecommunications, Inc., for ) violation of service standards.	DOCKET NO. 991378-TL	1
)	FILED: April 26, 2000	

## BELLSOUTH TELECOMMUNICATIONS, INC.'S MOTION FOR A TEMPORARY PROTECTIVE ORDER

COMES NOW BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), and files, pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, its Motion for Temporary Protective Order in connection with its Responses to Office of Public Counsel's ("Public Counsel") First Set of Interrogatories dated September 20, 1999.

On April 26, 2000, BellSouth filed its Responses to Public Counsel's First Set of Interrogatories, portions of which are deemed to be confidential and proprietary by BellSouth. Some of the information that will be conveyed to and reviewed by Public Counsel in connection with the responses to these interrogatories contain proprietary, confidential business information which should not be publicly disclosed. Thus, pursuant to the Commission's Rule on confidentiality, Rule 25-22.006(5)(c), Florida Administrative Code, BellSouth moves that the Prehearing Officer issue a Temporary Protective Order exempting these documents from § 119.07(1), Florida Statutes. The proprietary information in question includes, but is not limited to, marketing information.

Once Public Counsel notifies BellSouth that any of the proprietary documents

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are to be used in a proceeding for the Commission, BellSouth will file a detailed Motion for Protective Order specifically addressing each of the documents identified in accordance with Rule 25-22.006, Florida Administrative Code.

WHEREFORE, BellSouth respectfully requests the Commission to grant its Motion for Temporary Protective Order in regard to its Responses to Public Counsel's First Set of Interrogatories dated September 20, 1999.

Respectfully submitted this 26th day of April, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

NANCY B. WHITE

c/o Nancy Sims

150 South Monroe Street

Suite 400

Tallahassee, Florida 32301

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PC Docs 206661