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September 22, 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 are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Motion for a Temporary Protective Order for Certain Responses to Public Counsel's Forty-First Set of Interrogatories. 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.

Sincerely,

*Nancy B. White*  
Nancy B. White

- ACK ✓
- AFA 1
- APP 1
- CAF
- CMU
- CTR Enclosures
- EAG
- LEG 12/11
- LIN 6
- OPC
- RCH
- SEC 1
- WAS
- QTH

cc: All Parties of Record  
A. M. Lombardo  
H. R. Anthony  
R. D. Lackey

DOCUMENT NUMBER-DATE  
10283 SEP 23 93  
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**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 22nd day of September, 1993  
to:

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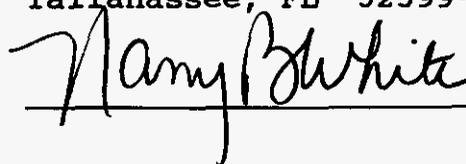
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\_\_\_\_\_

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Comprehensive Review of )  
the Revenue Requirements and Rate ) Docket No. 920260-TL  
Stabilization Plan of Southern )  
Bell Telephone and Telegraph ) Filed: September 22, 1993  
Company )  
\_\_\_\_\_ )

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
MOTION FOR A TEMPORARY PROTECTIVE ORDER  
FOR CERTAIN RESPONSES TO PUBLIC COUNSEL'S  
FORTY-FIRST SET OF INTERROGATORIES

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 August 23, 1993, the Office of Public Counsel ("Public Counsel") served upon Southern Bell its Forty-First Set of Interrogatories in the above captioned matter. Within that set of Interrogatories is an item which requests among other things, pension expenses relating to non-regulated companies. Southern Bell considers this information to be proprietary and confidential business information pursuant to Section 364.183(3), (3)(d) and (3)(e), Florida Statutes.

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 responses to Interrogatory Item No. 1051 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

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Motion for Protective Order specifically addressing the information identified.

4. With respect to Southern Bell's response to the above enumerated items, the information requested contains proprietary confidential business information including, but not limited to, revenue projections and cost information relating to non-regulated lines of business within Southern Bell and competitive market lease information. Such information is expressly exempt from the public inspection and examination provisions of § 119.07(1), Florida Statutes pursuant to § 364.183(3), (3)(d) and 3(e), 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 Forty-First Set of Interrogatories from § 119.07(1), Florida Statutes, in accordance with Rule 25-22.006, Florida Administrative Code.

Respectfully submitted this 22nd day of September, 1993.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY

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