

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Complaint of Robert A. Butterworth, )  
Attorney General, and the Citizens of the )  
State of Florida, by and through Jack Shreve,) )  
Public Counsel, against AT&T )  
Communications of the Southern States, )  
Inc. for slamming Robert Flint in violation )  
of Rule 25-4.118, F.A.C. )

Docket No. 971433-TI

Filed: 12/12/97

In re: Initiation of show cause proceedings )  
against AT&T of the Southern States, Inc. )  
and d/b/a/ Connect 'N Save for violation )  
of Rule 25-4.118, F.A.C., Interexchange )  
Carrier Selection )

Docket No. 971492-TI

AT&T's NOTICE OF INTENT  
TO REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATION  
AND REQUEST FOR TEMPORARY AND PERMANENT PROTECTIVE ORDER

Comes now AT&T Communications of the Southern States, Inc., (AT&T) and pursuant to Rule 22.006, Florida Administrative Code and Section 364.183, Florida Statutes, files this Notice of Intent to Request Specified Confidential Classification and Request for Temporary and Permanent Protective Order.

1. On December 2, 1997, the Office of the Public Counsel (OPC), on behalf of the Attorney General (AG) and Citizens of Florida, served upon AT&T a Notice of Deposition Duces Tecum in Docket No. 971433-TI for a deposition to be held on December 12, 1997.

2. Certain documents and information requested by OPC in its Notice of Deposition Duces Tecum are confidential and proprietary under Florida Statutes, Section

DOCUMENT NUMBER-DATE  
12745 DEC 12 97  
FPSC-RECORDS/REPORTING

364.183 and Rule 22.006, Florida Statutes. Because this information is proprietary, AT&T is filing this Notice of Intent to Request Confidential Classification in order to allow OPC and the AG to review and take possession of such documents and information without delay. AT&T also moves for a Temporary Protective Order exempting these documents from Section 119.07, Florida Statutes. The proprietary information includes, but is not limited to, trade secrets and information relating to AT&T's competitive interests.

3. Once Public Counsel or the Attorney General notifies AT&T that any of the proprietary documents are to be used in a proceeding before the Commission, AT&T 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, AT&T respectfully requests the Commission to grant its Motion for Temporary Protective Order in regard to documents produced in response to the Notice of Deposition Duces Tecum filed by OPC. It is AT&T's understanding that Docket No. 971433-TI will be consolidated or subsumed into Docket No. 971492-TI. AT&T therefore also requests that such Temporary Protective Order be granted and issued in both dockets or the surviving docket.

Respectfully submitted this 12th day of December, 1997.



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