

MICHAEL P. GOGGIN
General Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
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July 13, 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 are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion for a Temporary Protective Order for its *Supplemental* Responses to Citizens' Second Request for Production of Documents (Nos. 23 and 24), which we ask that you file 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 to the parties shown on the attached Certificate of Service.

Sincerely,

Michael P. Goggin

- APP _____
- CAF _____
- CMP 2
- COM 3
- CTR _____
- ECR _____
- LEG Clemons
- OPC _____
- PAI _____
- RGO _____
- SEC I
- SER _____
- OTH Kay

MPG/vf

cc: All parties of record
Marshall M. Criser III
R. Douglas Lackey
Nancy B. White

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Atkinson
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DOCUMENT NUMBER-DATE

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CERTIFICATE OF SERVICE
Docket No. 991378-TL

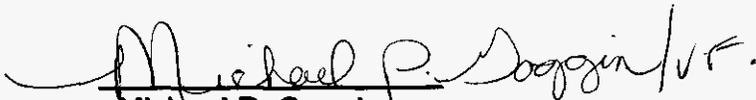
I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

(*) Hand Delivery and U.S. Mail this 13th day of July, 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


Michael P. Goggin

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Initiation of show cause) Docket No.: 991378-TL
 proceedings against BellSouth)
 Telecommunications, Inc., for)
 violation of service standards.)
 _____) Filed: July 13, 2000

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
 MOTION FOR A TEMPORARY PROTECTIVE ORDER
 FOR CITIZENS' SECOND PRODUCTION OF DOCUMENTS (Nos. 23 and 24)**

COMES NOW BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), and files, pursuant to Rule 25-22.006(6)(c), Florida Administrative Code, its Motion for Temporary Protective Order in connection with its *Supplemental Responses to Florida's Citizens' ("Citizens") Second Production of Documents (Nos. 23 and 24)*, dated May 10, 2000.

On June 9, 2000, BellSouth served its Responses to Citizens' Second Production of Documents and on July 12, 2000, BellSouth served its *Supplemental Responses to Citizens' Second Production of Documents (Nos. 23 and 24)*, portions of which are deemed to be confidential and proprietary by BellSouth. Some of the information that will be conveyed to and reviewed by Citizens' in connection with the *Supplemental Responses* to these production of documents includes proprietary, confidential business information which should not be publicly disclosed. Thus, pursuant to Rule 25-22.006(6)(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

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limited to, financial information. Once Citizens' notifies BellSouth that any of the proprietary documents 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 that the Commission grant its Motion for Temporary Protective Order in regard to its *Supplemental Responses to Citizens' Second Production of Documents* (Nos. 23 and 24) dated May 10, 2000.

Respectfully submitted this 13th day of July, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

Handwritten signature of Nancy B. White in cursive, followed by a horizontal line and the initials "V.F." to the right.

NANCY B. WHITE
MICHAEL P. GOGGIN
c/o Nancy Sims
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(305) 347-5555

Handwritten signature of R. Douglas Lackey in cursive, followed by a horizontal line and the initials "V.F." to the right.

R. DOUGLAS LACKEY
4300 Southern Bell Center
675 West Peachtree St., N.E.
Atlanta, Georgia 30375
(404) 335-0747

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