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**ORIGINAL  
FILE COPY**

August 24, 1992

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 its Response to Citizen's Eleventh Set of Interrogatories, Item No. 304, 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 on the parties shown on the attached Certificate of Service.

Sincerely yours,

*Sidney J. White, Jr.*  
Sidney J. White, Jr.

- ACK ✓
- AFA 3
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CHM Enclosures
- CLD \_\_\_\_\_
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- CLP 1 w/m
- CLT 6
- CLV \_\_\_\_\_
- ROH \_\_\_\_\_
- SEC 1
- WAS \_\_\_\_\_
- QTH \_\_\_\_\_

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09583 AUG 24 1992  
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**CERTIFICATE OF SERVICE**  
**Docket No. 920260-TL**

I HEREBY CERTIFY that a copy of the foregoing has been furnished  
by United States Mail this 24th day of August, 1992 to:

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Sidney J. White p. (02)

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of )  
the Revenue Requirements and Rate ) Docket No. 920260-TL  
Stabilization Plan of Southern ) Filed: August 24, 1992  
Bell Telephone and Telegraph )  
Company (Formerly FPSC Docket )  
Number 880069-TL) )  
\_\_\_\_\_)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
MOTION FOR A TEMPORARY PROTECTIVE ORDER FOR ITS  
RESPONSES TO CITIZEN'S ELEVENTH SET OF  
INTERROGATORIES, ITEM NO. 304

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 Protective Order.

1. On July 24, 1992, the Office of Public Counsel ("Public Counsel") served upon Southern Bell its Eleventh Set of Interrogatories. Within that set of interrogatories is Item No. 304, which requests information regarding certain financial returns and net income information realized by 1155 Peachtree Associates. Southern Bell considers this information to be proprietary and confidential business information pursuant to Section 364.183, Florida Statutes.

2. Pursuant to the Florida Public Service Commission's ("Commission") rule on confidentiality, Rule 25-22.006(5)(c), Florida Administrative Code, Southern Bell moves the Prehearing Officer to issue a Temporary Protective Order exempting the Company's responses to the above-referenced Interrogatories from § 119.07(1), Florida Statutes.

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3. With respect to Item No. 304, the information requested pertaining to the return on investment and net income realized by 1155 Peachtree Associates on its investment in the Campanile building in 1991 constitutes proprietary and confidential business information relating to the financial affairs of an unregulated business entity. Such financial information is considered to be a trade secret by non-publicly traded businesses. Such trade secrets are specifically considered to be proprietary and confidential business information under § 364.183, Florida Statutes.

4. 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 Motion for Protective Order specifically addressing the information identified.

WHEREFORE, Southern Bell respectfully requests that the Prehearing Officer issue a Temporary Protective Order exempting Southern Bell's responses to Item No. 304 of Public Counsel's Eleventh Set of Interrogatories from § 119.07(1), Florida Statutes in accordance with Rule 25-22.006, Florida Administrative Code.

Respectfully submitted this 24th day of August, 1992.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY

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