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ORIGINAL
FILE COPY

October 26, 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 Temporary Protective Order for portions of its Responses to Public Counsel's Fifteenth Set of Interrogatories, Item Nos. 367 and 370, 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,


Sidney J. White, Jr.

ACK

AFA 3

APP _____

CAF _____

CMR _____

OTB Enclosures

EEB cc: All Parties of Record

LEE 1 w/m A. M. Lombardo

LH 6 H. R. Anthony

LH 6 R. D. Lackey

GRB _____

RCH _____

SEC L

WAS _____

OTH _____

RECEIVED & FILED

OFFICE OF THE CLERK OF THE SUPREME COURT OF FLORIDA

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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 26th day of October, 1992 to:

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Motel Association

A handwritten signature in black ink, appearing to read "J. J. White". The signature is written in a cursive style with a horizontal line underneath the name.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Comprehensive Review)
of the Revenue Requirements and) Docket No. 920260-TL
Rate Stabilization Plan of)
Southern Bell Telephone and) Filed: October 26, 1992
Telegraph Company (Formerly FPSC)
Docket Number 880069-TL)
_____)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
MOTION FOR A TEMPORARY PROTECTIVE ORDER
FOR ITS RESPONSE TO PUBLIC COUNSEL'S FIFTEENTH SET
OF INTERROGATORIES, ITEM NOS. 367 AND 370

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 October 8, 1992, the Office of Public Counsel ("Public Counsel") served upon Southern Bell its Fifteenth Set of Interrogatories. Within that set of Interrogatories are Item Nos. 367 and 370, which request information regarding certain proprietary development and concept field trials of a competitive nature. Southern Bell considers this information to be proprietary and confidential business information pursuant to § 364.183, 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 the above-referenced Interrogatories from § 119.07(1), Florida Statutes.

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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 Motion for Protective Order specifically addressing the information identified.


4. With respect to Southern Bell's responses to Item Nos. 367 and 370, the information requested pertains to current software development and concept field trial work being conducted by Southern Bell. This information relates to Southern Bell's competitive interests and also specifically discloses vendor-specific information. Such information is expressly exempt from the public inspection and examination provision of § 119.07(1), Florida Statutes pursuant to § 364.183(3)(d) and (e), Florida Statutes.

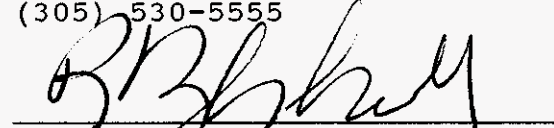
5. All of the information for which Southern Bell requests confidential treatment is intended to be treated as confidential, has been treated as confidential and has not been disclosed to any third party except pursuant to statutory provisions or private agreement that provides that the information will 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 Item Nos. 367 and 370 of Public Counsel's Fifteenth Set of Interrogatories from § 119.97(1), Florida Statutes, in accordance with Rule 25-22.006, Florida Administrative Code.

Respectfully submitted this 26th day of October, 1992.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY


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