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February 4, 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. [REDACTED]

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Response to Order No. PSC-93-0071-PCO-TL and Motion for Temporary Protective Order. 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. 3 Copies have been served on the parties shown on the attached certificate of service.

- ACK
- AFA 3
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAC _____

Sincerely,

Nancy B. White

Nancy B. White

LE 14/MS Enclosures

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

- SEL 1
- WJ _____
- OTR Raf

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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 4th day of February, 1993 to:

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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)
Bell Telephone and Telegraph) Filed: February 4, 1993
Company (Formerly FPSC Docket)
Number 880069-TL))
_____)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
RESPONSE TO ORDER NO. PSC-93-0071-PCO-TL
AND MOTION FOR TEMPORARY PROTECTIVE ORDER

COMES NOW BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), and files (1) its response to Order No. PSC-93-0071-PCO-TL and (2) pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, its Motion for Temporary Protective Order.

1. During the course of the above-captioned proceeding, the Office of Public Counsel ("Public Counsel") has filed numerous discovery requests in the form of interrogatories and requests for production upon Southern Bell. In the course of responding to these discovery requests, Southern Bell objected to Public Counsel's attempt to obtain discovery from BellSouth Corporation. Southern Bell also objected to production of information regarding states other than Florida and regarding unregulated activities. Public Counsel filed Motions to Compel the production of this information.

2. On January 15, 1993, the Prehearing Officer in this case granted these Motions to Compel. The Prehearing Officer ordered Southern Bell to produce BellSouth Corporation documents responsive to Public Counsel's discovery, as well as to unredact the information regarding operations in states other than Florida

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and information regarding unregulated activities. Southern Bell was further ordered to produce such documents by February 4, 1993.

3. Southern Bell has gathered the documents in accordance with the Prehearing Officer's order and a review by Public Counsel has been scheduled. Some of the documents that will be reviewed by Public Counsel contain proprietary, confidential business information that should not be publicly disclosed. Thus, pursuant to the Commission's 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 these documents from § 119.07(1), Florida Statutes. Specifically, these documents include but are not limited to, strategic planning information, financial planning information and competitive business information. If Public Counsel subsequently notifies Southern Bell that any of the proprietary documents are to be used in a proceeding before the Commission, Southern Bell will, in accordance with Rule 25-22.006, Florida Administrative Code, file a detailed motion for protective order specifically addressing each of the documents identified.

WHEREFORE, based on the foregoing, Southern Bell moves the Prehearing Officer to enter a temporary protective order covering the information made available to Public Counsel in connection with Order No. PSC-93-0071-PCO-TL.

Respectfully submitted this 4th day of February, 1993.

SOUTHERN BELL TELEPHONE
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