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May 24, 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. 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 Public Counsel's Twenty-Fifth Set of Interrogatories, Item Nos. 582 and 583. 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. Copies have been served on the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White
ACK
APM
Nancy B. White / (02)

Enclosures

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

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CERTIFICATE OF SERVICE

Docket No. 920260-TL

Docket No. 900960-TL

Docket No. 910163-TL

Docket No. 910727-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 24th day of May, 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: May 24, 1993
Company)
_____)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
MOTION FOR A TEMPORARY PROTECTIVE ORDER
FOR ITS RESPONSE TO PUBLIC COUNSEL'S TWENTY-FIFTH SET
OF INTERROGATORIES, ITEM NOS. 582 AND 583

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 April 21, 1993, the Office of Public Counsel ("Public Counsel") served upon Southern Bell its Twenty-Fifth Set of Interrogatories in the above captioned matter. Within that set of Interrogatories is Item Nos. 582 and 583, which request personal employee-specific information unrelated to compensation, duties, qualifications, or responsibilities. Southern Bell considers this information to be proprietary and confidential business information pursuant to § 364.183(f), 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 response to the above-referenced Interrogatory from § 119.07(1), Florida Statutes.

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 response to Item Nos. 582 and 583, the information requested is information of a personal nature relating to home and business addresses, and such information is unrelated to compensation, duties, qualifications, or responsibilities. Such information is expressly exempt from the public inspection and examination provisions of § 119.07(1), Florida Statutes pursuant to § 364.183(3)(f), Florida Statutes. Moreover, the legitimate privacy interests of this individual must be taken into consideration in this case where the employee's personal information is being sought in a public proceeding.

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 response to Item Nos. 582 and 583 of Public Counsel's Twenty-Fifth 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 May, 1993.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY

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