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JUN 25 1993

June 25, 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 is 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-Eighth Set of Interrogatories, Item No. 610. 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,

*Sidney J. White, Jr.*

Sidney J. White, Jr. (021)

Enclosures

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

ACK  
MFA 1  
APP 1  
CAF  
STR  
EAG  
LEG 1 w/m  
LIT 4  
RCH  
SEC 1  
WAS  
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RECEIVED & FILED

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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 25th day of June, 1993 to:

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*Sidney J. White, Jr.*  
\_\_\_\_\_ (e)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review )  
of the Revenue Requirements and ) Docket No. 920260-TL  
Rate Stabilization Plan of )  
Southern Bell Telephone and ) Filed: June 25, 1993  
Telegraph Company (Formerly FPSC )  
Docket Number 880069-TL )

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SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
MOTION FOR A TEMPORARY PROTECTIVE ORDER  
FOR ITS RESPONSE TO PUBLIC COUNSEL'S TWENTY-EIGHTH SET  
OF INTERROGATORIES, ITEM NO. 610

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 May 21, 1993, the Office of Public Counsel ("Public Counsel") served upon Southern Bell its Twenty-Eighth Set of Interrogatories. Within that set of Interrogatories is Item No. 610, which requests information regarding certain proprietary revenue information relating to a non-regulated line of business. Southern Bell considers this information to be proprietary and confidential business information pursuant to § 364.183(3)(e), 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

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for Protective Order specifically addressing the information identified.

4. With respect to Southern Bell's response to Item No. 610, the information requested contains nonregulated line of business revenue information. Such information is expressly exempt from the public inspection and examination provision of § 119.07(1), Florida Statutes pursuant to § 364.183(3)(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 response to Item No. 610 of Public Counsel's Twenty-Eighth Set of Interrogatories from § 119.07(1), Florida Statutes, in accordance with Rule 25-22.006, Florida Administrative Code.

Respectfully submitted this 25th day of June, 1993.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY

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