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July 28, 1993

BY HAND DELIVERY

Mr. Steven C. Tribble, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

Re: Petition of Intermedia Communications of
Florida, Inc. for Expanded Interconnection
for AAVs within LEC Central Offices
Docket No. 921074-TP

Dear Mr. Tribble:

Enclosed for filing in the above-styled docket are the original and fifteen (15) copies of United Telephone Company of Florida's Motion for Temporary Protective Order.

ACK Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

AFA

APP

CAF

CML

CTR

EAG

LEG LW/m

LIT LLW/bjb

OPC Enclosures


ROH cc: All Parties of Record (w/encl.)

SEC L

WAS

OTH RJ

Thank you for your assistance in this matter.

Sincerely,

Lee L. Willis

RECEIVED & FILED

99
FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

08127 JUL 28 93

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL
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In re: Petition of Intermedia) DOCKET NO. 921074-TP
Communications of Florida, Inc. for) Filed: July 28, 1993
Expanded Interconnection for AAVs)
within LEC Central Offices)
_____)

MOTION FOR TEMPORARY PROTECTIVE ORDER

United Telephone Company of Florida ("United" or "UTF"), pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, moves this Commission for a Temporary Protective Order in this docket, and as grounds therefor states:

1. On June 28, 1993, the Office of Public Counsel ("Public Counsel") served by U.S. mail its First Request for Production of Documents to United, consisting of seven individual requests ("First POD"). Public Counsel seeks UTF's response to the First POD on or before July 28, 1993. Under Florida Rule of Civil Procedure 1.350, United's Response is due August 2, 1993.

2. The materials and information which may be responsive to Public Counsel's First POD include information which UTF claims is proprietary confidential business information, and is of a type this Commission has found in past dockets to be confidential. This includes material and documents in the following categories: (a) customer billing information and related documents, and (b) customer names and phone numbers.

3. United believes that documents in these categories are within the scope of Section 364.183(3), Florida Statutes, and must be afforded protection as "proprietary confidential business information."

DOCUMENT NUMBER-DATE

08127 JUL 28 83

FPSC-RECORDS/REPORTING

4. Public Counsel has indicated its desire to have certain of the materials and information it has designated made available so that it may more closely review certain materials and information provided over a longer period of time and provide copies of certain documents for review to its consultants. One objective of this review would be to reduce the volume of materials and information actually taken by Public Counsel and, ultimately, the volume of proprietary confidential materials and information which will be needed as evidence or supporting documentation in this docket. This review, in United's opinion, has the potential to significantly reduce the volume of material and information for which final proprietary confidential treatment must eventually be requested.

5. By this Motion, United requests that the materials and information made available for inspection in response to Public Counsel's First POD be granted the protection of an Interim Protective Order as provided for by Rule 25-22.006(5)(c), Florida Administrative Code. This Temporary Protective Order will protect the materials and information from disclosure until Public Counsel completes his review of the materials and information. Once the review is completed, Public Counsel will notify United of the materials and information he intends to use in this docket, and UTF, in accordance with Rule 25-22.006(5)(a), will request proprietary confidential treatment of those portions of the materials and information which are, in its opinion, entitled to such treatment. The remainder of any materials and information

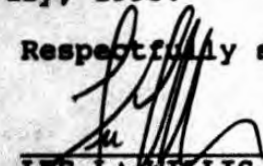
which Public Counsel has taken possession of pursuant to this Interim Protective Order will be returned to United by Public Counsel pursuant to Rule 25-22.006(5)(c). United anticipates that this procedure will reduce the volume of materials for which proprietary confidential treatment must be sought. The alternative to this approach entails lengthy, but ultimately needless, review by the parties and by the Commission of materials which Public Counsel does not find necessary for its purposes in this docket.

6. Nothing in this Motion is intended to, or shall it, create a precedent as to the confidentiality of any of the material sought to be protected, or intended to preclude any party from challenging United's claim of proprietary confidential treatment for any material or information when United files its Final Request for Confidential Classification.

WHEREFORE, United moves for a Temporary Protective Order covering materials produced in response to the Public Counsel's First Request for Production of Documents in this docket.

DATED this 28th day of July, 1993.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 28th day of July, 1993, to the following:

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