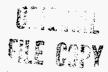
SIDNEY J. WHITE, JR. General Attorney

Southern Bell Telephone and Telegraph Company 150 South Monroe Street Suite 400 Tallahassee, Florida 32301 (404) 529-5094



August 19, 1993

920260-TL

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

RE: Docket No. (900960-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 Fifth Set of Interrogatories, Item No. 25, which we ask that you file in the above-captioned docket.

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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 19th day of August, 1993 to:

Robin Norton
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Florida Public Service
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Tallahassee, FL 32399-0866

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## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION



In re: Show Cause proceeding against Southern Bell Telephone and Telegraph Company for misbilling customers

) Docket No. 900960-TL ) ) Filed: August 19, 1993

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S MOTION FOR A TEMPORARY PROTECTIVE ORDER FOR ITS RESPONSE TO PUBLIC COUNSEL'S FIFTH SET OF INTERROGATORIES, ITEM NO. 25

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 July 20, 1993, the Office of Public Counsel ("Public Counsel") served upon Southern Bell its Fifth Set of Interrogatories. Within that set of Interrogatories is Item No. 25, which requests financial and market information regarding the Company's unregulated inside wire service operations. 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 Company's
  response to the above-referenced Interrogatory 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 response to Item No.
  25, the information requested contains financial and market
  information regarding the Company's unregulated inside wire
  service operations. The information contains revenue and demand
  trend information regarding these services, which if publicly
  disclosed could result in competitive harm to Southern Bell's
  competitive interests. Pursuant to Section 364.183(3)(e),
  Florida Statutes, this information is specifically considered to
  be proprietary confidential business information which is exempt
  from the public inspection and examination provisions of Section
  119.07(1), 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
Southern Bell's response to Item No. 25 of Public Counsel's Fifth

Set of Interrogatories from § 119.97(1), Florida Statutes, in accordance with Rule 25-22.006, Florida Administrative Code.

Respectfully submitted this 19th day of August, 1993.

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

HARRIS R. ANTHONY

c/o Marshall M. Criser, III

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150 South Monroe Street Tallahassee, Florida 32301

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