MANCY B. WHITE General Attorney

Southern Bell Telephone and Telegraph Company Suite 400 150 South Monroe Street Tallahassee, Florida 32301 (404) 529-5387

October 20, 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 Certain Responses to Public Counsel's Forty-Seventh Set of Interrogatories. 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

Enclosures

cc: All Parties of Record

A. M. Lombardo H. R. Anthony R. D. Lackey

RCH ____ SEC ____ WAS ____

GPC _____

OTH _____

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

11296 OCT 20 8

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of the Revenue Requirements and Rate Stabilisation Plan of Southern Bell Telephone and Telegraph Company

Docket No. 920260-TL Filed: October 20, 1993 200

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S MOTION FOR A TEMPORARY PROTECTIVE ORDER FOR CERTAIN RESPONSES TO PUBLIC COUNSEL'S FORTY-SEVENTH SET OF INTERROGATORIES

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 September 20, 1993, the Office of Public Counsel

 ("Public Counsel") served upon Southern Bell its Forty-Seventh Set of
 Interrogatories in the above captioned matter. Within that set of
 Interrogatories are items which request among other things, financial
 information related to non-regulated affiliates. Southern Bell
 considers this information to be proprietary and confidential
 business information pursuant to Section 364.183(3), (3)(d) and

 (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 responses to Interrogatory Item No. 1227 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

DOCUMENT NUMBER-DATE

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FF50-RECORDS/REFURTING

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Motion for Protective Order specifically addressing the information identified.

- 4. With respect to Southern Bell's response to the above enumerated items, the information requested contains proprietary confidential business information including, but not limited to, financial information related to nonregulated affiliate companies. Such information is expressly exempt from the public inspection and examination provisions of § 119.07(1), Florida Statutes pursuant to § 364.183(3), (3)(d) and 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 responses to Public Counsel's Forty-Fourth Set of Interrogatories from § 119.07(1), Florida Statutes, in accordance with Rule 25-22.006, Florida Administrative Code.

Respectfully submitted this 20th day of October, 1993.

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

HARRIS R. ANTHONY

J. PHILLIP CARVER

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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 20th day of October, 1993 to:

Robin Norton
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Tallahassee, FL 32399-0866

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