

NANCY B. WHITE
General Attorney

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

ORIGINAL
FILE COPY

November 29, 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 Fifty-Fifth Set of Interrogatories. Please file this document in the above-captioned docket.

ACK A copy of this letter is enclosed. Please mark it to
 AFA 2 indicate that the original was filed and return the copy to me.
 APP _____ Copies have been served on the parties shown on the attached
 _____ Certificate of Service.
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 CMU _____
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 EAG _____
 LEG 1w/mend
 LIN 6 Enclosures
 OPC _____ cc: All Parties of Record
 RCH _____ A. M. Lombardo
 SEC 1 H. R. Anthony
 WAS _____ R. D. Lackey
 OTH _____

Sincerely,

Nancy B. White (PW)
Nancy B. White

RECEIVED & FILED
ms

DOCUMENT NUMBER-DATE

12759 NOV 29 93

FPSC-RECORDS/REPORTING

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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: November 29, 1993
Company)	
)	

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
MOTION FOR A TEMPORARY PROTECTIVE ORDER
FOR CERTAIN RESPONSES TO PUBLIC COUNSEL'S
FIFTY-FIFTH 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 October 26, 1993, the Office of Public Counsel ("Public Counsel") served upon Southern Bell its Fifty-Fifth Set of Interrogatories in the above captioned matter. Within that set of Interrogatories are items which request among other things, financial information concerning unregulated entities. 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. 1367 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

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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 concerning unregulated entities. Such information is expressly exempt from the public inspection and examination provisions of § 119.07(1), Florida Statutes pursuant to Section 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 Fifty-Fifth Set of Interrogatories from § 119.07(1), Florida Statutes, in accordance with Rule 25-22.006, Florida Administrative Code.

Respectfully submitted this 29th day of November, 1993.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY

Harris R. Anthony (am)

HARRIS R. ANTHONY
J. PHILLIP CARVER
c/o Marshall M. Criser, III
400 - 150 South Monroe Street
Tallahassee, Florida 32301
(305) 530-5555

R. Douglas Lackey (am)

R. DOUGLAS LACKEY
NANCY B. WHITE
4300 - 675 West Peachtree Street
Atlanta, Georgia 30375
(404) 529-5387

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 29th day of November, 1993
to:

Robin Norton
Division of Communications
Florida Public Service
Commission
101 East Gaines Street
Tallahassee, FL 32399-0866

Charles J. Beck
Deputy Public Counsel
Office of the Public Counsel
111 W. Madison Street
Room 812
Tallahassee, FL 32399-1400

Tracy Hatch
Division of Legal Services
Florida Public Svc. Commission
101 East Gaines Street
Tallahassee, FL 32399-0863

Michael J. Henry
MCI Telecommunications Corp.
780 Johnson Ferry Road
Suite 700
Atlanta, Georgia 30342

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Grandoff & Reeves
315 South Calhoun Street
Suite 716
Tallahassee, FL 32301-1838
atty for FIXCA

Richard D. Melson
Hopping Boyd Green & Sams
Post Office Box 6526
Tallahassee, Florida 32314
atty for MCI

Kenneth A. Hoffman
Messer, Vickers, Caparello,
Madsen, Lewis & Metz, PA
Post Office Box 1876
Tallahassee, FL 32302
atty for FPTA

Rick Wright
Regulatory Analyst
Division of Audit and Finance
Florida Public Svc. Commission
101 East Gaines Street
Tallahassee, FL 32399-0865

Michael W. Tye
AT&T Communications of the
Southern States, Inc.
106 East College Avenue
Suite 1410
Tallahassee, Florida 32301

Laura L. Wilson, Esq.
c/o Florida Cable Television
Association, Inc.
Post Office Box 10383
310 North Monroe Street
Tallahassee, FL 32302
atty for FCTA

Dan B. Hendrickson
Post Office Box 1201
Tallahassee, FL 32302
atty for FCAN

Chanthina R. Bryant
Sprint Communications Co.
Limited Partnership
3065 Cumberland Circle
Atlanta, GA 30339

Benjamin H. Dickens, Jr.
Blooston, Mordkofsky,
Jackson & Dickens
2120 L Street, N.W.
Washington, DC 20037
Atty for Fla Ad Hoc

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs, Odom
& Ervin
305 South Gadsen Street
Post Office Drawer 1170
Tallahassee, Florida 32302
atty for Sprint

Florida Pay Telephone
Association, Inc.
c/o Mr. Lance C. Norris
President
Suite 710, Barnett Bank Bldg.
315 South Calhoun Street
Tallahassee, FL 32302

Monte Belote
Florida Consumer Action Network
4100 W. Kennedy Blvd., #128
Tampa, FL 33609

Donald L. Bell, Esq.
104 East Third Avenue
Tallahassee, FL 32303
Atty for AARP

Angela Green
Division of Legal Services
Florida Public Svc. Commission
101 East Gaines Street
Tallahassee, FL 32399-0863

Gerald B. Curington
Department of Legal Affairs
Room 1603, The Capitol
Tallahassee, FL 32399-1050

Mr. Douglas S. Metcalf
Communications Consultants,
Inc.
631 S. Orlando Ave., Suite 250
P. O. Box 1148
Winter Park, FL 32790-1148

Mr. Cecil O. Simpson, Jr.
General Attorney
Mr. Peter Q. Nyce, Jr.
General Attorney
Regulatory Law Office
Office of the Judge
Advocate General
Department of the Army
901 North Stuart Street
Arlington, VA 22203-1837

Mr. Michael Fannon
Cellular One
2735 Capital Circle, NE
Tallahassee, FL 32308

Floyd R. Self, Esq.
Messer, Vickers, Caparello,
Madsen, Lewis, Goldman & Metz
Post Office Box 1876
Tallahassee, FL 32302-1876
Attys for McCaw Cellular

Stan Greer
Division of Communications
Florida Public Svc. Commission
101 East Gaines Street
Tallahassee, FL 32399-0863

Nancy B. White (pm)