Legal Department

NANCY B. WHITE General Attorney

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

### March 16, 1995

Mrs. Blanca S. Bayo Director, Division of Records and Reporting Florida Public Service Commission 101 East Gaines Street Tallahassee, Florida 32301

RE: Docket No. 920260-TL

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Motion for a Temporary Protective Order. Please file these documents in the 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.

ACK		Sincerely,		
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# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Comprehensive Review of the Revenue Requirements and Rate Stabilization Plan of Southern Bell Telephone and Telegraph Company (Formerly FPSC Docket Number 880069-TL) Docket No. 920260-TL Filed: March 16, 1995

#### SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S MOTION FOR A TEMPORARY PROTECTIVE ORDER

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 in connection with its Responses to Office of Public Counsel's ("Public Counsel") Second Set of Post-Settlement Interrogatories dated February 9, 1995.

On March 16, 1995, Southern Bell filed its Response to Public Counsel's Second Set of Post-Settlement Interrogatories, portions of which are deemed to be confidential and proprietary by Southern Bell. Some of the documents that will be delivered to and reviewed by Public Counsel in connection with these responses to these interrogatories contain proprietary, confidential business information which should not be publicly disclosed. Thus, pursuant to the Commission's Rule on confidentiality, Rule 25-22.006(5)(c), Florida Administrative Code, Southern Bell moves that the Prehearing Officer issue a Temporary Protective Order exempting these documents from § 119.07(1), Florida Statutes. The proprietary information in question includes but is not limited to information concerning nonregulated operations and employee personnel information.

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unrelated to compensation, duties, qualifications or responsibilities. Once Public Counsel notifies Southern Bell that any of the proprietary documents are to be used in a proceeding for the Commission, Southern Bell will file a detailed Motion for Protective Order specifically addressing each of the documents identified in accordance with Rule 25-22.006, Florida Administrative Code.

WHEREFORE, Southern Bell respectfully requests the Commission to grant its Motion for Temporary Protective Order in regard to its Responses to Public Counsel's Second Set of Post-Settlement Interrogatories dated February 9, 1995.

Respectfully submitted this 16th day of March, 1995.

## ATTORNEYS FOR SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

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R. DOUGLAS LACKEY NANCY B. WHITE 4300 Southern Bell Center 675 West Peachtree St., N.E. Atlanta, Georgia 30375 (404) 529-5387 (404) 529-7208 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 16th day of March, 1995 to: Robin Norton Charles J. Beck Division of Communications Deputy Public Counsel Florida Public Service Office of the Public Counsel Commission 111 W. Madison Street 101 East Gaines Street Room 812 Tallahassee, FL 32399-0866 Tallahassee, FL 32399-1400 Tracy Hatch Michael J. Henry MCI Telecommunications Corp. Division of Legal Services Florida Public Svc. Commission 780 Johnson Ferry Road 101 East Gaines Street Suite 700 Tallahassee, FL 32399-0863 Atlanta, Georgia 30342 Joseph A. McGlothlin Richard D. Melson Vicki Gordon Kaufman Hopping Boyd Green & Sams McWhirter, Grandoff & Reeves Post Office Box 6526 315 South Calhoun Street Tallahassee, Florida 32314 atty for MCI Suite 716 Tallahassee, FL 32301-1838 atty for FIXCA Rick Wright Regulatory Analyst Division of Audit and Finance Kenneth A. Hoffman Messer, Vickers, Caparello, Florida Public Svc. Commission Madsen, Lewis & Metz, PA 101 East Gaines Street Post Office Box 1876 Tallahassee, FL 32399-0865 Tallahassee, FL 32302 atty for FPTA Laura L. Wilson, Esq. Florida Cable Michael W. Tye Telecommunications Assn., Inc. 310 North Monroe Street AT&T Communications of the Southern States, Inc. Tallahassee, FL 32301 atty for FCTA 106 East College Avenue Suite 1410 Chanthina R. Bryant Tallahassee, Florida 32301 Sprint Communications Co. Dan B. Hendrickson Limited Partnership Post Office Box 1201 3100 Cumberland Circle Tallahassee, FL 32302 Atlanta, GA 30339 atty for FCAN

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