Nancy B. White Assistant General Counsel-Florida BellSouth Telecommunications, Inc. c/o Nancy H. Sims Suite 400 150 South Monroe Street Tallahassee, Florida 32301 Telephone (305) 347-5558

May 2, 1997

Mrs. Blanca S. Bayó Director, Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

## Re: Docket No. 920260-TL

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion for a Temporary Protective Order, which we ask that you file 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 to the parties shown on the attached Certificate of Service.

ACK AFA APP CAF CMU Enclosures CTR cc: All parties of record EAG - A. M. Lombardo LEG R. G. Beatty LIN William J. Ellenberg II OPC RCH RECEIVED & FILED SEC WAS \_ EPSC-BUREAU OF RECORDS OTH \_

Sincerely,

Nanay B. W Nancy B. White

DOCUMENT NUMBER-DATE 04391 MAY-25 FPSC-RECORDS/REPORTING

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 920260-TL

Filed: May 2, 1997

# BELLSOUTH TELECOMMUNICATIONS, INC.'S MOTION FOR A TEMPORARY PROTECTIVE ORDER

COMES NOW BellSouth Telecommunications, Inc. ("BellSouth" 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") First Set of Post-Settlement Interrogatories (1996 Earnings) dated March 28, 1997.

On May 2, 1997, BellSouth filed its Responses to Public Counsel's First Set of Post-Settlement Interrogatories (1996 Earnings), portions of which are deemed to be confidential and proprietary by BellSouth. Some of the information that will be conveyed to and reviewed by Public Counsel in connection with the responses to these interrogatories contain proprietary, confidential business information which should not be publicly disclosed. Thus, pursuant to the Rule Commission's confidentiality, 25-22.006(5)(c). on Rule Florida Administrative Code, BellSouth 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 settlements of lawsuits and other claims, as

> DOCUMENT NUMBER-DATE 04391 MAY-25 FPSC-RECORDS/REPORTING

well as information concerning unregulated operations. Once Public Counsel notifies BellSouth that any of the proprietary documents are to be used in a proceeding for the Commission, BellSouth 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, BellSouth respectfully requests the Commission to grant its Motion for Temporary Protective Order in regard to its Responses to Public Counsel's First Set of Post-Settlement Interrogatories (1996 Earnings) dated March 28, 1997.

Respectfully submitted this 2nd day of May, 1997.

## BELLSOUTH TELECOMMUNICATIONS, INC.

Bratting ROBERT G. BEATT

NANCY B. WHITE c/o Nancy Sims 150 South Monroe Street Suite 400 Tallahassee, Florida 32301 (305) 347-5555

WILLIAM J. ELLENBERG J. PHILLIP CARVER 4300 Southern Bell Center 675 West Peachtree St., N.E. Atlanta, Georgia 30375 (404) 335-0711

#### CERTIFICATE OF SERVICE Docket No. 920260-TL

I HEREBY CERTIFY that a copy of the foregoing has been

furnished by U. S. Mail and \* Hand-Delivery this 2nd day of May

1997 to:

Bob Elias 201 South Monroe Street

Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

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White that Nancy B. White