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SERVING THE CLIENT
AND THE COMMUNITY

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November 20, 1997

ORIGINAL

Ms. Blanca S. Bayo
Director, Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Bouleyard
Tallahassee, Florida 32399-0850

Re: Docket No. 920260-TL

Dear Ms. Bayo:

Enclosed is an original and fifteen copies of BellSouth Corporation's Response and Objection to Public Service Commission's Audit Document/Record Request Notice of Intent and Motion for Temporary Protective Order. We ask that this be filed in the captioned matter.

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,



E. Gary Early

ACK _____
AFA _____
APP _____
CAF EGE/mcd
CMU 1
CTR enclosures
EAC cc: All parties of record
LEG 1
LIN 5
OPC _____
ROH _____
SEC 1
WAS _____
OTH cy to Matilda (FyF)

TALLAHASSEE

ORLANDO

MIAMI

TAMPA

DOCUMENT NUMBER-DATE

11966 NOV 20 97

FPS RECORDS & REPORTING
WEST PALM BEACH

BEFORE THE 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 November 20, 1997

**BELLSOUTH CORPORATION'S
 RESPONSE AND OBJECTION TO THE PUBLIC SERVICE COMMISSION'S
 AUDIT DOCUMENT/RECORD REQUEST NOTICE OF INTENT AND
MOTION FOR A TEMPORARY PROTECTIVE ORDER**

BellSouth Corporation (BSC) pursuant to Rule 25-22.034, Florida Administrative Code and Rule 1.350, Florida Rules of Civil Procedure, files its Response to the Public Service Commission's Audit Document/Record Request Notice of Intent dated October 21, 1997 and, pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, files its Motion for Temporary Protective Order and states:

1. Some of the documents that will be made available for review by the PSC contain proprietary, confidential business information that should not be publicly disclosed. Pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, BSC moves the Prehearing Officer to issue a Temporary Protective Order exempting these documents from Section 119.07(1), Florida Statutes. These documents contain, among other things, nonregulated operations information, and other proprietary confidential business information. Such information is "proprietary confidential business information" pursuant to Section 364.183(3)(f), Florida Statutes. If the Public Service Commission subsequently notifies BSC that any of the proprietary documents are to be used in a proceeding before the Commission, BSC will, in accordance with Rule 25-22.006, Florida Administrative Code, file a Motion for Protective Order specifically addressing each of the documents identified.

DOCUMENT NUMBER-DATE

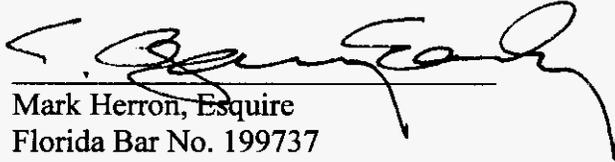
11966 NOV 20 97

FPSC-RECORDS/REPORTING

2. The Public Service Commission, through its record request, is attempting to obtain information in the possession, custody, or control of an entity that is neither a party to this docket nor regulated by the PSC. Requests for Production may only be directed to parties, and any attempt by the PSC to obtain discovery from non-parties should be prohibited. See 1.340, Florida Rules of Civil Procedure; Broward v. Kerr, 454 So.2d 1068 (4th D.C.A. 1984).

3. Subject to the response and Motion for Temporary Protective Order herein, documents to be made available will be produced for inspection and review at the office of undersigned counsel upon reasonable notice.

Respectfully submitted this 20th day of November, 1997.



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Florida Bar No. 325147
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Attorneys for BellSouth Corporation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by hand delivery to Mike Buckley, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399-0850 with copies served by U.S. Mail to the parties identified on the attached list on this 20th day of November, 1997.

**CERTIFICATE OF SERVICE
DOCKET NO. 920260-TL**

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