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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Initiation of show cause proceedings)
against AT&T of the Southern States, Inc.)
and d/b/a/ Connect 'N Save for violation)
of Rule 25-4.118, F.A.C., Interexchange)
Carrier Selection)
_____)

Docket No. ~~97-1492-T~~
Filed: January 16, 1997

AT&T's NOTICE OF INTENT
TO REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATION
AND REQUEST FOR TEMPORARY AND PERMANENT PROTECTIVE ORDER

Comes now AT&T Communications of the Southern States, Inc., (AT&T) and pursuant to Rule 22.006, Florida Administrative Code and Section 364.183, Florida Statutes, files this Notice of Intent to Request Specified Confidential Classification and Request for Temporary and Permanent Protective Order.

1. On December 15, 1997, the Office of the Public Counsel (OPC), on behalf of the Attorney General (AG) and Citizens of Florida, served upon AT&T its First Set of Requests for Production of Documents (Nos. 1-13) in this docket.

2. Certain documents requested by OPC in its Request for Production of Documents are confidential and proprietary under Florida Statutes, Section 364.183 and Rule 22.006, Florida Statutes. Because this information is proprietary, AT&T is filing this Notice of Intent to Request Confidential Classification in order to allow OPC and the AG to review and take possession of such documents and information without delay. AT&T also moves for a Temporary Protective Order exempting these documents from

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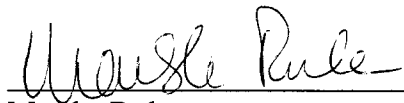
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Section 119.07, Florida Statutes. The proprietary information includes, but is not limited to, trade secrets and information relating to AT&T's competitive interests.

3. Once Public Counsel or the Attorney General notifies AT&T that any of the proprietary documents are to be used in a proceeding before the Commission, AT&T 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, AT&T respectfully requests the Commission to grant its Motion for Temporary Protective Order in regard to documents produced in response to the First Request for Production of Documents (Nos. 1-13) filed by OPC on December 15, 1997.

Respectfully submitted this 15th day of January, 1997.



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**ATTORNEY FOR AT&T
COMMUNICATIONS OF THE
SOUTHERN STATES, INC.**


CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished by U.S. mail this
15th day of January, 1998, to:

Charles J. Beck
Office of the Public Counsel
c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee FL 32399-1400

Michael A. Gross
Assistant Attorney General
Department of Legal Affairs
PL-101, The Capitol
Tallahassee, FL 32399-1050

John Bowman
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee FL 32399-0850



Marsha E. Rule

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Robert A. Butterworth,)
Attorney General, and the Citizens of the)
State of Florida, by and through Jack Shreve,) Docket No. 971433-TI
Public Counsel, against AT&T)
Communications of the Southern States,) Filed: 12/12/97
Inc. for slamming Robert Flint in violation)
of Rule 25-4.118, F.A.C.)
_____)

In re: Initiation of show cause proceedings)
against AT&T of the Southern States, Inc.) Docket No. 971492-TI
and d/b/a/ Connect 'N Save for violation)
of Rule 25-4.118, F.A.C., Interexchange)
Carrier Selection)
_____)

AT&T's NOTICE OF INTENT
TO REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATION
AND REQUEST FOR TEMPORARY AND PERMANENT PROTECTIVE ORDER

Comes now AT&T Communications of the Southern States, Inc., (AT&T) and pursuant to Rule 22.006, Florida Administrative Code and Section 364.183, Florida Statutes, files this Notice of Intent to Request Specified Confidential Classification and Request for Temporary and Permanent Protective Order.

1. On December 2, 1997, the Office of the Public Counsel (OPC), on behalf of the Attorney General (AG) and Citizens of Florida, served upon AT&T a Notice of Deposition Duces Tecum in Docket No. 971433-TI for a deposition to be held on December 12, 1997.

2. Certain documents and information requested by OPC in its Notice of Deposition Duces Tecum are confidential and proprietary under Florida Statutes, Section

364.183 and Rule 22.006, Florida Statutes. Because this information is proprietary, AT&T is filing this Notice of Intent to Request Confidential Classification in order to allow OPC and the AG to review and take possession of such documents and information without delay. AT&T also moves for a Temporary Protective Order exempting these documents from Section 119.07, Florida Statutes. The proprietary information includes, but is not limited to, trade secrets and information relating to AT&T's competitive interests.

3. Once Public Counsel or the Attorney General notifies AT&T that any of the proprietary documents are to be used in a proceeding before the Commission, AT&T 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, AT&T respectfully requests the Commission to grant its Motion for Temporary Protective Order in regard to documents produced in response to the Notice of Deposition Duces Tecum filed by OPC. It is AT&T's understanding that Docket No. 971433-TI will be consolidated or subsumed into Docket No. 971492-TI. AT&T therefore also requests that such Temporary Protective Order be granted and issued in both dockets or the surviving docket.

Respectfully submitted this 12th day of December, 1997.

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(850) 425-6361 (fax)

**ATTORNEY FOR AT&T
COMMUNICATIONS OF THE
SOUTHERN STATES, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished by hand delivery
this 12th day of December, 1997, to:

Charles J. Beck
Office of the Public Counsel
c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee FL 32399-1400

Michael A. Gross
Assistant Attorney General
Department of Legal Affairs
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