

RECEIVED-FPSC

Legal Department

NANCY B. WHITE
Assistant General Counsel-Florida

99 APR -2 PM 4: 34

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5558

RECORDS AND
REPORTING

April 2, 1999

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

Re: Docket Nos. ~~980946~~-TL, 980947-TL, 980948-TL, 981011-TL,
981012-TL AND 981250-TL

Dear Ms. Bayó:

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

Sincerely,

Nancy B. White (re)

Nancy B. White

ACK _____

AFA 3 _____

APP _____

CAF _____ Enclosures

CMU 15 _____

CTR _____ cc: All parties of record
Marshall M. Criser III
William J. Ellenberg II

EAG _____

LEG 2 _____

LIN 5 _____

OPC _____

RCH _____

SEC 1 _____

WAS _____

OTH 980946 only _____

RECEIVED & FILED

[Signature]
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

04298 APR-2 99

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket Nos. 980946-TL, 980947-TL, 980948-TL, 981011-TL,
981012-TI and 981250-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U.S. Mail this 2nd day of April, 1999 to the following:

Beth Keating, Esq.
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Charles J. Pellegrini
Wiggins & Villacorta, P.A.
2145 Delta Boulevard
Suite 200
P.O. Drawer 1657
Tallahassee, FL 32302
Tel. No. (850) 385-6007
Fax. No. (850) 385-6008

Steve Brown
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619-1309
Tel. No. (813) 829-0011
Fax. No. (813) 829-4923

Floyd R. Self, Esq.
Messer, Caparello & Self, P.A.
215 South Monroe Street
Suite 701
Tallahassee, FL 32301-1876
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359

Mr. Brian Sulmonetti
WorldCom Technologies, Inc.
1515 South Federal Highway
Suite 400
Boca Raton, FL 33432
Tel. No. (561) 750-2940
Fax. No. (561) 750-2629

David V. Dimlich, Esq.
Legal Counsel
Supra Telecommunications &
Information Systems, Inc.
2620 S.W. 27th Avenue
Miami, FL 33133
Tel. No. (305) 476-4235
Fax. No. (305) 443-1078

Amanda Grant
BellSouth Telecommunications, Inc.
Regulatory & External Affairs
675 West Peachtree Street, N.E.
Room 38L64
Atlanta, Georgia 30375

Norman H. Horton, Jr.
Messer, Caparello & Self, P.A.
215 S. Monroe Street
Suite 701
Tallahassee, Florida 32301-1876
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Represents e.spire»

James C. Falvey, Esq.
e.spire» Communications, Inc.
133 National Business Parkway
Suite 200
Annapolis Junction, Maryland 20701
Tel. No. (301) 361-4298
Fax. No. (301) 361-4277

Kenneth A. Hoffman, Esq.
John R. Ellis, Esq.
Rutledge, Ecenia, Underwood,
Purnell & Hoffman, P.A.
P.O. Box 551
Tallahassee, FL 32301
Tel. No. (850) 681-6788
Fax. No. (850) 681-6515

Steven Gorosh
Vice President and General Counsel
NorthPoint Communications, Inc.
222 Sutter Street, 7th Floor
San Francisco, CA 94108
Tel. No. (415) 659-6518
Fax. No. (415) 658-4190

Charles A. Hudak, Esq.
Jeremy D. Marcus, Esq.
Gerry, Friend & Saprnov, LLP
Three Ravinia Drive, Suite 1450
Atlanta, GA 30346-2131
Tel. No. (770) 399-9500
Fax. No. (770) 395-0000
Attys. for ACI Corp.

Jeffrey Blumenfeld, Esq.
Elise P.W. Kiely, Esq.
Blumenfeld & Cohen
1615 M Street, NW
Suite 700
Washington, DC 20036
Tel. No. (202) 955-6300
Fax. No. (202) 955-6460
Attys. for ACI Corp.

Peter M. Dunbar, Esq.
Barbara D. Auger, Esq.
Pennington, Moore, Wilkinson
& Dunbar, P.A.
Post Office Box 10095
Tallahassee, FL 32302-2095
Tel. (850) 222-3533
FAx (850) 222-2126
Attys for Time Warner Telecom

Carolyn Marek
VP of Reg. Affairs
Time Warner Communications
233 Bramerton Court
Franklin, TN 37069
Tel. (615) 376-6404
Fax (615) 376-6405

Monica M. Barone
Sprint Communications Company
Limited Partnership
3100 Cumberland Circle
Mailstop GAATLN0802
Atlanta, GA 30339

James D. Earl, Esq.
Covad Communications, Inc. d/b/a
DIECA Communications
700 Thirteenth Street NW
Suite 950
Washington, DC 20005
Tel: (202) 434-8902
Fax: (202) 434-8932

Richard D. Melson
Gabriel E. Nieto
Hopping Green Sams & Smith
Post Office Box 6526
Tallahassee, FL 32314
Attys. for ACI Corp.

Nancy B. White (cse)
Nancy B. White

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Waiver of Physical) Docket No.: 980946-TL
 Collocation Requirements Set Forth)
 In the Telecommunications Act of 1996)
 And the FCC's First Report and Order,)
 for the Daytona Beach Port Orange Central)
 Office, By BellSouth Telecommunications, Inc.)

In re: Petition for Waiver of Physical) Docket No.: 980947-TL
 Collocation Requirements Set Forth)
 In the Telecommunications Act of 1996)
 And the FCC's First Report and Order,)
 for the Boca Raton Boca Teeca Central)
 Office, By BellSouth Telecommunications, Inc.)

In re: Petition for Waiver of Physical) Docket No.: 980948-TL
 Collocation Requirements Set Forth)
 In the Telecommunications Act of 1996)
 And the FCC's First Report and Order,)
 for the Miami Palmetto Central)
 Office, By BellSouth Telecommunications, Inc.)

In re: Petition for Waiver of Physical) Docket No.: 981011-TL
 Collocation Requirements Set Forth)
 In the Telecommunications Act of 1996)
 And the FCC's First Report and Order,)
 For the West Palm Beach Gardens)
 Central Office, By BellSouth)
 Telecommunications, Inc.)

In re: Petition for Waiver of Physical) Docket No.: 981012-TL
 Collocation Requirements Set Forth)
 In the Telecommunications Act of 1996)
 And the FCC's First Report and Order,)
 For the North Dade Golden Glades)
 Central Office, By BellSouth)
 Telecommunications, Inc.)

In re: Petition for Waiver of Physical) Docket No.: 981250-TL
 Collocation Requirements Set Forth)
 In the Telecommunications Act of 1996)
 And the FCC's First Report and Order,)
 for the Lake Mary Main Central)
 Office, By BellSouth Telecommunications, Inc.)

FILED: April 2, 1999

**MOTION FOR PERMANENT
PROTECTIVE ORDER**

Now comes BellSouth Telecommunications, Inc. ("BellSouth"), and files this Motion for Permanent Protective Order. The parties to this docket have indicated that they have no objection. BellSouth seeks a Permanent Protective Order from the Prehearing Officer for the following reasons:

1. Staff and the parties desire to use ALEC specific information at the hearings of the above captioned matter. This information results from BellSouth's responses to discovery issued by Staff and the parties, as well as that which will potentially result from the depositions of various witnesses to this proceeding. BellSouth, and the respective owners of the information, consider this information to be proprietary and subject to Sections 364.183 and 364.24, Florida Statutes.

2. BellSouth, therefore, seeks a permanent Protective Order that will include the following restrictions: ("Proprietary Information").

- a. The dissemination of any Proprietary Information concerning ALEC parties will be limited to counsel of record;
- b. Non-party ALEC Proprietary Information will be disseminated only in the aggregate;
- c. The use of any Proprietary Information protected under this Order will be limited to this docket;
- d. The provisions of this Order will continue to govern all Proprietary Information unless and until a final order is

rendered by the Commission or a court of competent jurisdiction determining that specific items of information are non-confidential at which time the Order will cease to apply to such non-confidential information, but will remain in effect as to the remainder of the information;

- e. This Order will not apply to information already in the public domain;
- f. This Order will supplement the procedure for use of confidential information set forth in the Prehearing Order and the Order Establishing Procedure issued in this docket.

WHEREFORE, in order for the Staff and counsel for the parties to have access to such Proprietary Information in this docket, BellSouth seeks granting of this Motion and that the Prehearing Officer issue a Permanent Protective Order as requested herein.

Respectfully submitted this 2nd day of April, 1999.

BELLSOUTH
TELECOMMUNICATIONS, INC.

Nancy B. White (ke)
NANCY B. WHITE
c/o Nancy Sims
150 South Monroe Street
Suite 400
Tallahassee, FL 32301
(305) 347-5558