

ORIGINAL  
FILE COPY

Harris R. Anthony  
General Attorney-Florida

Southern Bell Telephone  
and Telegraph Company  
Legal Department  
c/o Marshall Criser  
Suite 400  
150 South Monroe Street  
Tallahassee, Florida 32301  
Phone (305) 530-5555

September 25, 1990

Mr. Steve C. Tribble  
Director, Division of Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32301

In re: Docket No. 891194-TL

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's (I) Supplement to its July 24, 1990 Response and Objections to Public Counsel's Request for Production of Documents and (II) Motion for Temporary Protective Order which we ask that you file in the above-referenced 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.

Sincerely yours,

*Harris R. Anthony*  
Harris R. Anthony  
(22)

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG \_\_\_\_\_
- LIN \_\_\_\_\_
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC \_\_\_\_\_
- NAS \_\_\_\_\_
- DTH \_\_\_\_\_

Enclosures

cc: All Parties of Record  
A. M. Lombardo  
R. Douglas Lackey  
E. Barlow Keener  
John F. Fons

RECEIVED & FILED

EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

03555 SEP 25 1990

EPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE  
Docket No. 891194-TL

I HEREBY CERTIFY that a copy of the foregoing has been  
furnished by United States Mail this 25th day of September, 1990  
to:

Walter D'Haeseleer  
Division of Communications  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32399-0866

Michael R. Ramage  
Deputy General Counsel  
Fla. Dept. of Law Enforcement  
Post office Box 1489  
Tallahassee, Florida 32302

Angela Greene  
Division of Legal Services  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32399-0863

Robert A. Butterworth  
Attorney General  
Dept. of Legal Affairs  
The Capitol  
Tallahassee, FL 32399-1050

Jack Shreve  
Public Counsel  
Office of the Public Counsel  
c/o Florida House of Rep.  
The Capitol  
Tallahassee, FL 32399-1300

Winston Pierce  
Dept. of General Services  
Roger Executive Center  
2737 Centerview Drive  
Knight Bldg. #110  
Tallahassee, Florida 32203

John E. Thrasher, Esq.  
Jeffrey L. Cohen, Esq.  
Florida Medical Association  
Post Office Box 2411  
Jacksonville, Florida 32203

Pete Antonacci  
Statewide Prosecutor  
Dept. of Legal Affairs  
The Capitol, Plaza 01  
Tallahassee, FL 32399-1050

Willis Booth, Director  
Florida Police Chiefs  
Association  
Post Office Box 14038  
Tallahassee, Florida 32317-4038

Alan N. Berg  
Senior Attorney  
United Telephone Co. of Fla.  
Post Office Box 5000  
Altamonte Spgs, FL 32716-5000

Thomas R. Parker, Esq.  
GTE Florida Incorporated  
Post Office Box, 110 MC 7  
Tampa, Florida 33601-0110

Cheryl Phoenix, Director  
Florida Coalition Against  
Domestic Violence  
Post Office Box 532041  
Orlando, FL 32853-2041

Department of Legal Affairs  
Richard E. Doran  
Director, Criminal Appeals  
The Capitol  
Tallahassee, Florida 32399-1050

Glenn W. Mayne, Director  
Florida Dept. of Gen. Services  
Division of Communications  
2737 Centerview Drive  
Tallahassee, FL 3399-0950

Harris R. Anthony (222)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed tariff filings by ) Docket No. 891194-TL  
Southern Bell Telephone and )  
Telegraph Company clarifying when ) Filed: September 25, 1990  
a non published number can be )  
disclosed and introducing Caller )  
ID to Touchstar Service )  
\_\_\_\_\_)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
(I) SUPPLEMENT TO ITS JULY 24, 1990 RESPONSE AND  
OBJECTIONS TO PUBLIC COUNSEL'S REQUEST FOR PRODUCTION OF  
DOCUMENTS AND (II) MOTION FOR TEMPORARY PROTECTIVE ORDER

COMES NOW SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY  
("Southern Bell" or "Company"), pursuant to Rule 25-2.034, Florida  
Administrative Code, and Rules 1.280 and 1.350, Florida Rules of  
Civil Procedure, and files its (I) Supplemental Response and  
Objections to the Office of Public Counsel's ("Public Counsel")  
June 19, 1990 Request for Production of Documents and (II) Motion  
for Temporary Protective Order.

1. As a result of a continuing search of Southern Bell's  
documents, Southern Bell is supplementing its Response and  
Objections to Public Counsel's Request for Production of Documents  
filed on July 24, 1990. Southern Bell incorporates herein by  
reference its Response and Objections to Public Counsel's Request  
for Production of Documents filed on July 24, 1990.

2. Numerous documents, which Southern Bell is producing to  
Public Counsel, contain customer proprietary information. This

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information includes customers' names, telephone numbers and addresses. As set forth in Section 119(3)(x), Florida Statutes, "all records supplied by a telecommunications company to a state or local governmental agency which contain the name, address and telephone number of subscribers are exempt from provisions of subsection (1)." Because certain documents being produced to Public Counsel contain customer specific information, Southern Bell requests that the Commission issue a Temporary Protective Order exempting these documents from Section 119.07(1), Florida Statutes. Pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, Southern Bell hereby offers to allow Public Counsel to inspect or take possession of these documents for the purpose of allowing Public Counsel to determine what information contained in these documents will be used at the hearing in this proceeding. Once Public Counsel determines the documents, if any, to be used by it at the hearing, Southern Bell will file a specific request for a protective Order as required by Rule 25-22.006(5)(a), Florida Administrative Code.

Respectfully submitted this 25th day of September, 1990.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY

*Harris R. Anthony*  
HARRIS R. ANTHONY (ex)  
E. BARLOW KEENER  
Suite 1910 Museum Tower  
150 W. Flagler Street  
Miami, Florida 33130