

Harris R. Anthony General Attorney-Florida Southern Bell Telephome and Telegraph Company Legal Department c/o Marshall Criser Suite 400 150 South Monroe Street Tallahassec, Florida 32331 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:

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EPAC-BURBAU OF RECORDS

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.

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CERTIFICATE OF SLIVICE 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 Fla. Dept. of Law Enforcement 101 East Gaines Street Tallahassee, Florida 32399-0866

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

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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

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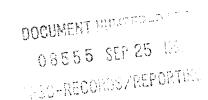
BEFORE THE FLORIDA PUBLIC STRVICE COMMISSION

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



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 E. BARLOW KEENER

Suite 1910 Museum Tower 150 W. Flagler Street Miami, Florida 33130