

NANCY B. WHITE  
General Attorney

Southern Bell Telephone  
and Telegraph Company  
150 South Monroe Street  
Suite 400  
Tallahassee, Florida 32301  
(404) 529-5387

June 29, 1992

ORIGINAL  
FILE COPY

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

RE: Docket No. 920260-TL

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Motion for a Temporary Protective Order for its Response to Public Counsel's Seventh Set of Interrogatories, Item No. 102 which we ask that you file in the above-captioned 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 on the parties shown on the attached Certificate of Service.

Sincerely yours,

*Nancy B. White*  
Nancy B. White (2)

CK ✓  
FA 3  
PP \_\_\_\_\_  
AF \_\_\_\_\_  
MU \_\_\_\_\_  
R \_\_\_\_\_  
G \_\_\_\_\_  
G 10/m  
V 6  
C \_\_\_\_\_  
H \_\_\_\_\_  
C ✓  
AS \_\_\_\_\_  
H \_\_\_\_\_

Enclosures

cc: All Parties of Record  
A. M. Lombardo  
H. R. Anthony  
R. D. Lackey

RECEIVED & FILED

*[Signature]*  
FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

06952 JUN 29 1992

FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE**  
**Docket No. 920260-TL**

I HEREBY CERTIFY that a copy of the foregoing has been  
furnished by United States Mail this 29th day of June, 1992 to:

Robin Norton  
Division of Communications  
Florida Public Service  
Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0866

Charles J. Beck  
Deputy Public Counsel  
Office of the Public Counsel  
111 W. Madison Street  
Room 812  
Tallahassee, FL 32399-1400

Angela Green  
Division of Legal Services  
Florida Public Svc. Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0863

Michael J. Henry  
MCI Telecommunications Corp.  
MCI Center  
Three Ravinia Drive  
Atlanta, Georgia 30346-2102

Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter, Grandoff & Reeves  
522 East Park Avenue,  
Suite 200  
Tallahassee, Florida 32301  
atty for FIXCA

Richard D. Melson  
Hopping Boyd Green & Sams  
Post Office Box 6526  
Tallahassee, Florida 32314  
atty for MCI

Joseph Gillan  
J. P. Gillan and Associates  
Post Office Box 541038  
Orlando, Florida 32854-1038

Rick Wright  
Regulatory Analyst  
Division of Audit and Finance  
Florida Public Svc. Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0865

Patrick K. Wiggins  
Wiggins & Villacorta, P.A.  
Post Office Drawer 1657  
Tallahassee, Florida 32302  
atty for Intermedia

Peter M. Dunbar  
Haben, Culpepper, Dunbar  
& French, P.A.  
306 North Monroe Street  
Post Office Box 10095  
Tallahassee, FL 32301  
atty for FCTA

Floyd R. Self, Esq.  
Messer, Vickers, Caparello,  
Madsen, Lewis & Metz, PA  
Post Office Box 1876  
Tallahassee, FL 32302  
atty for US Sprint

Chanthina R. Bryant  
Sprint  
3065 Cumberland Circle  
Atlanta, GA 30339

*Nancy B. White*  
(22)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of ) Docket No. 920260-TL  
the Revenue Requirements and Rate )  
Stabilization Plan of Southern ) Filed: June 29, 1992  
Bell Telephone and Telegraph )  
Company (Formerly FPSC Docket )  
Number 880069-TL) )  
\_\_\_\_\_)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
MOTION FOR A TEMPORARY PROTECTIVE ORDER  
FOR ITS RESPONSE TO PUBLIC COUNSEL'S  
SEVENTH SET OF INTERROGATORIES, ITEM NO. 102

COMES NOW BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company") and files pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, its Motion for Temporary Protective Order.

1. On May 28, 1992 the Office of Public Counsel ("Public Counsel") served upon Southern Bell its Seventh Set of Interrogatories. Within that set of interrogatories is Item No. 102 which requests information regarding the total and per square foot cost of BellSouth Corporations Headquarters' lease space in the Campanile building in Atlanta, Georgia in 1991. Southern Bell considers this information to be proprietary confidential business information pursuant to Section 364.183, Florida Statutes.

2. Pursuant to the Florida Public Service Commission's ("Commission") rule on confidentiality, Rule 25-22.006(5)(c), Florida Administrative Code, Southern Bell moves the Prehearing Officer to issue a Temporary Protective Order exempting this data from § 119.07(1), Florida Statutes. This information is entitled to confidential treatment because release of the total and per

DOCUMENT NUMBER-DATE

06952 JUN 29 1992

FPSC-RECORDS/REPORTING


square foot cost of the space leased to BellSouth Corporation at the Campanile building, in Atlanta, Georgia, concerns contractual data, the disclosure of which would impair the efforts of the Company or its affiliates to contract for goods or services on favorable terms. This type of data is specifically defined as proprietary confidential business information in § 364.183(3)(d), Florida Statutes.

3. If Public Counsel subsequently notifies Southern Bell that this proprietary information is to be used in a proceeding before the Commission, Southern Bell will, in accordance with Rule 25-22.006 Florida Administrative Code, file a detailed Motion for Protective Order specifically addressing the information identified.

WHEREFORE, Southern Bell respectfully requests that the Prehearing Officer issue a Temporary Protective Order exempting Southern Bell's response to Item 102 of Public Counsel's Seventh Set of Interrogatories from § 119.07(1), Florida Statutes in accordance with Rule 25-22.006, Florida Administrative Code.

Respectfully submitted this 29th day of June, 1992.

ATTORNEYS FOR SOUTHERN BELL  
TELEPHONE AND TELEGRAPH COMPANY

  
HARRIS R. ANTHONY (22)  
PHILLIP J. CARVER  
c/o Marshall M. Criser  
150 South Monroe Street  
Suite 400  
Tallahassee, Florida 32301  
(305) 530-5555

[SIGNATURES CONTINUED ON NEXT PAGE]

*R. Douglas Lackey*

R. DOUGLAS LACKEY

NANCY B. WHITE

4300 Southern Bell Center

675 West Peachtree St., N.E.

Atlanta, Georgia 30375

(404) 529-3862

(404) 529-5387