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ORIGINAL
FILE COPY

August 24, 1992

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 are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Motion for a Protective Order for its Response to FIXCA's First Set of Interrogatories, Item Nos. 19 and 20 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,

Sidney J. White, Jr.
Sidney J. White, Jr.

ACK ✓

AFA 3

APP _____

CAE Enclosures

CMcc: All Parties of Record

CTR _____ A. M. Lombardo

H. R. Anthony

EAC _____ R. D. Lackey

LEG LW/m

LIM 6

OPC _____ RECEIVED & FILED

RCH _____

SEC 1 J. J.
FPSC BUREAU OF RECORDS

WAS _____

OTH _____

DOCUMENT NUMBER-DATE

09587 AUG 24 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 24th day of August, 1992 to:

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c/o Charlotte Brayer, Esquire
275 John Knox Road, EE 102
Tallahassee, FL 32303

Sidney J. White Jr. (102)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of)
the Revenue Requirements and Rate) Docket No. 920260-TL
Stabilization Plan of Southern) Filed: August 24, 1992
Bell Telephone and Telegraph)
Company (Formerly FPSC Docket)
Number 880069-TL))
_____)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
MOTION FOR PROTECTIVE ORDER FOR ITS RESPONSES TO
THE FLORIDA INTEREXCHANGE CARRIER ASSOCIATION'S
FIRST SET OF INTERROGATORIES, ITEM NOS. 19 AND 20

ORIGINAL
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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)(a) and (b), Florida Administrative Code, its Motion for Protective Order.

1. On July 24, 1992, the Florida Interexchange Carrier Association (FIXCA) served upon Southern Bell its First Set of Interrogatories. Within that set of interrogatories are Item Nos. 19 and 20, which request information regarding intraLATA toll market demand and other competitively sensitive business information compiled by Southern Bell which should not be publicly disclosed. Consequently, Southern Bell objects to providing the answers to the above-referenced interrogatories and moves the Prehearing Officer to issue a Protective Order directing that discovery not be had. In the alternative, the Company would agree to negotiate an appropriate protective agreement which would protect Southern Bell's proprietary and confidential business information while allowing FIXCA's attorneys to review the responses.

DOCUMENT NUMBER-DATE

09587 AUG 24 1992

FPSC-RECORDS/REPORTS

WHEREFORE, Southern Bell respectfully requests that the Prehearing Officer issue a Protective Order directing that discovery not be had, or in the alternative that the responses to Item Nos. 19 and 20 be provided only after the execution of an appropriate protective agreement between Southern Bell and FIXCA.

Respectfully submitted this 24th day of August, 1992.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY

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