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September 28, 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 MCI's First Set of Interrogatories, Item Nos. 84 and 85 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,


Sidney J. White, Jr.

- ACK
- AFA
- AFP
- CAF
- CMH
- ~~Enclosures~~
- CTE
- cc: All Parties of Record
- M. Lombardo
- H. R. Anthony
- R. D. Lackey
- _____
- _____
- _____
- _____
- _____
- _____
- _____

DOCUMENT NUMBER-DATE
11302 SEP 28 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 28th day of September, 1992 to:

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A handwritten signature in black ink, appearing to read "J. J. White". The signature is written in a cursive style with a horizontal line underneath the name. There is a small mark at the end of the signature that looks like a colon or a period.

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: September 28, 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
MCI TELECOMMUNICATIONS CORPORATION'S
FIRST SET OF INTERROGATORIES, ITEM NOS. 84 AND 85


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.

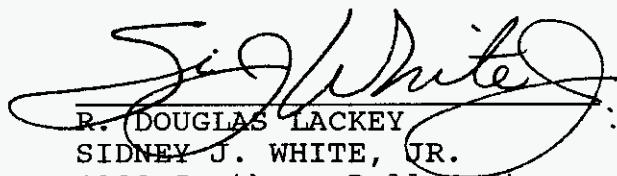
1. On August 27, 1992, MCI Telecommunications Corporation ("MCI") served upon Southern Bell its First Set of Interrogatories. Within that set of interrogatories are Item Nos. 84 and 85, which request information regarding intraLATA toll market demand and other competitively sensitive business information 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 MCI's attorneys to review the responses.

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. 84 and 85 be provided only after the execution of an appropriate protective agreement between Southern Bell and MCI.

Respectfully submitted this 28th day of September, 1992.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY


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