

SIDNEY J. WHITE, JR.
General Attorney

Southern Bell Telephone
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ORIGINAL
FILE COPY

November 25, 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. 910163-TL

Dear Mr. Tribble:

Enclosed is an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Motion for Temporary Protective Order for its Response to Public Counsel's Thirtieth Set of Interrogatories, Item No. 4. Please file this document 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.

ACK _____
AFB _____
AFS _____
CCT _____

Sincerely,

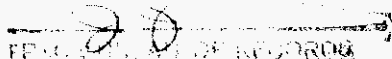

Sidney J. White, Jr.

C Enclosures

cc: All Parties of Record
A. M. Lombardo
1 w/ H. R. Anthony
6 R. Douglas Lackey

CFD _____
FBI _____
S. I. _____
W. _____

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CERTIFICATE OF SERVICE
Docket No. 910163-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this 25th day of November 1992 to:

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

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

A handwritten signature in cursive script, appearing to read "Tracy Hatch", written over a horizontal line.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Petition on Behalf of)
Citizens of the State of Florida) Docket No. 910163-TL
to Initiate Investigation into)
Integrity of Southern Bell) Filed: November 25, 1992
Telephone and Telegraph Company's)
Repair Service Activities and)
Reports.)
_____)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
MOTION FOR TEMPORARY PROTECTIVE ORDER
FOR ITS RESPONSE TO PUBLIC COUNSEL'S
THIRTIETH SET OF INTERROGATORIES, ITEM NO. 4

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 for its response to Public Counsel's Thirtieth Set of Interrogatories, Item No. 4.

1. On October 20, 1992, the Office of Public Counsel ("Public Counsel") served upon Southern Bell its Thirtieth Set of Interrogatories. Within that set of Interrogatories is Item No. 4, which requests information regarding certain employee-specific information unrelated to compensation, duties, qualifications, or responsibilities. Southern Bell considers this information to be proprietary and confidential business information pursuant to § 364.183, Florida Statutes.

2. Pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, Southern Bell moves the Prehearing Officer to issue a Temporary Protective Order exempting the Company's response to the above-referenced Interrogatory from § 119.07(1), Florida Statutes.

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3. If Public Counsel subsequently notifies Southern Bell that this proprietary information is to be used in a proceeding before this Commission, Southern Bell will, in accordance with Rule 25-22.006(5)(c), Florida Administrative Code, file a detailed Motion for Protective Order specifically addressing the information identified.

4. With respect to Southern Bell's response to Item No. 4, the information requested contains the names and locations of certain of the employees who were disciplined as a result of the Company's internal investigation relating to repair service activities. This information is employee-specific information unrelated to compensation, duties, qualifications, or responsibilities. Thus, this information is proprietary confidential business information exempt from § 119.07(1), Florida Statutes, pursuant to § 364.183(f), Florida Statutes.


5. All of the information for which Southern Bell requests confidential treatment is intended to be treated as confidential has been treated as confidential and has not been disclosed to any third party except pursuant to statutory provisions or private agreement that provides that the information will not be released to the public.

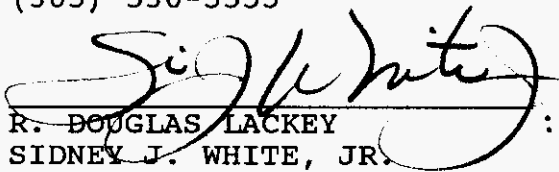
WHEREFORE, Southern Bell respectfully requests that the Prehearing Officer issue a Temporary Protective Order exempting Southern Bell's response to Item No. 4 of Public Counsel's Thirtieth Set of Interrogatories from § 119.07(1), Florida

Statutes, in accordance with Rule 25-22.006, Florida
Administrative Code.

Respectfully submitted this 25th day of November 1992.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY


HARRIS R. ANTHONY (21)
J. PHILLIP CARVER
c/o Marshall M. Criser
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Tallahassee, Florida 32301
(305) 530-5555


R. DOUGLAS LACKEY :
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