

CERTIFICATE OF SERVICE
Docket No. 920260-TL

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A handwritten signature in black ink, appearing to read "Joe J. White". The signature is written in a cursive style with a horizontal line underneath the name.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of)
the Revenue Requirements and Rate) Docket No. 920260-TL
Stabilization Plan of Southern)
Bell Telephone and Telegraph) Filed: December 28, 1992
Company)
_____)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
RESPONSE TO PUBLIC COUNSEL'S PETITION TO INSPECT AND EXAMINE
STAFF'S RATE CASE AUDIT REPORT AND WORKPAPERS
AND MOTION FOR TEMPORARY PROTECTIVE ORDER

COMES NOW BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), and files (1) pursuant to Rule 25-22.006(6)(a), Florida Administrative Code, its Response to Public Counsel's Petition to Inspect and Examine Staff's Rate Case Audit Report and Workpapers and (2) pursuant to Rule 25-22.006(5)(a) and (c), Florida Administrative Code, its Motion for Temporary Protective Order.

MOTION FOR TEMPORARY PROTECTIVE ORDER

Some of the documents that Southern Bell will consent to be inspected and examined by Public Counsel contain proprietary, confidential business information that should not be publicly disclosed. Thus, pursuant to Rule 25-22.006(5)(a) and (c), Florida Administrative Code, Southern Bell moves the Prehearing Officer to issue a Temporary Protective Order exempting these documents from Section 119.07(1), Florida Statutes. These documents contain, among other things, vendor-specific information, information relating to internal auditing activities, employee personnel information unrelated to compensation, duties, qualifications or responsibilities, competitive information on unregulated services, market research

DOCUMENT NUMBER-DATE

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and other proprietary confidential business information. Such information is specifically included as proprietary confidential business information pursuant to Section 364.183, Florida Statutes. If Public Counsel subsequently notifies Southern Bell that any of the proprietary documents are 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 each of the documents identified.

1. On December 11, 1992, Public Counsel filed a Petition to Inspect and Examine Staff's Rate Case Audit Report and Workpapers (Petition), specifically seeking access to Staff's rate case audit report and workpapers relating to "cost allocation manual procedures." (Petition at p. 1) In addition, Public Counsel is seeking Southern Bell's consent, pursuant to Rule 25-22.006(6)(b), Florida Administrative Code, to inspection and examination of the Company's proprietary confidential business information contained in the subject audit report and workpapers.


2. On December 23, 1992, Southern Bell filed, pursuant to Rule 25-22.006(3)(a) and (4), Florida Administrative Code, a Request for Confidential Classification for the proprietary confidential business information contained in the audit report and workpapers sought to be reviewed by Public Counsel in its Petition. Inasmuch as this Request is currently pending, the information should continue to remain exempt from the public inspection and examination provisions of Section 119.07, Florida Statutes. However, Southern Bell has no objection to Public

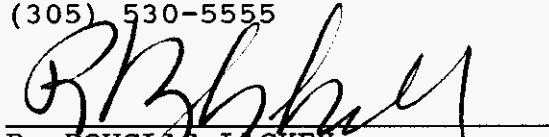
Counsel's inspection and examination of the above-referenced audit report and workpapers subject to the terms and conditions set forth herein.

3. Consequently, Southern Bell hereby consents to Public Counsel's inspection and examination of the above-referenced audit report and workpapers on cost allocation manual procedures. This consent shall not constitute a waiver of confidentiality, and is expressly made subject to both the Company's Motion for Temporary Protective Order set forth above, and its pending Request for Confidential Classification filed on December 23, 1992.

Respectfully submitted this 28th day of December, 1992.

SOUTHERN BELL TELEPHONE
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