

SIDNEY J. WHITE, JR.
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Southern Bell Telephone
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January 4, 1993

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 are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Motion for Temporary Protective Order for portions of its Response to Public Counsel's Thirty-Second Set of Interrogatories, Item No. 1, 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.

- ACK ✓
- AFA /
- APP _____
- CAF _____
- CMU _____

Sincerely,


Sidney J. White, Jr.

CTF Enclosures

- EPB cc: All Parties of Record
- LEB 1 W/M A. M. Lombardo
- LEB 4 H. R. Anthony
- LEB 4 R. D. Lackey
- OPD _____
- ROH _____
- SEC /
- WAS _____
- OTH Kap

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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 4th day of January, 1993 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 "Si J. White", with a horizontal line drawn through the middle of the signature and a colon at the end.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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: January 4, 1993
Telephone and Telegraph Company's)
Repair Service Activities and)
Reports.)
_____)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
MOTION FOR A TEMPORARY PROTECTIVE ORDER
FOR ITS RESPONSE TO PUBLIC COUNSEL'S THIRTY-SECOND SET
OF INTERROGATORIES, ITEM NO. 1

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 December 1, 1992, the Office of Public Counsel ("Public Counsel") served upon Southern Bell its Thirty-Second Set of Interrogatories. Within that set of Interrogatories is Item No. 1, which requests personal 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(f), 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 portions of the Company's response to the above-referenced Interrogatory from § 119.07(1), Florida Statutes.

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

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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. 1, the information requested is information of a personal nature relating to certain Company employees, and such information is unrelated to compensation, duties, qualifications, or responsibilities. Such information is expressly exempt from the public inspection and examination provisions of § 119.07(1), Florida Statutes pursuant to § 364.183(3)(f), Florida Statutes. Moreover, the legitimate privacy interests of these individuals must be taken into consideration in this case where these employees' personal information is being sought in a public proceeding.

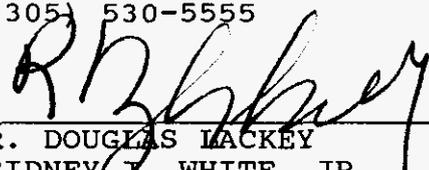
5. All of the information for which Southern Bell requests confidential treatment is intended to be treated as confidential, has been treated as confidential and has not been disclosed to any third party except pursuant to statutory provisions or private agreement that provides that the information will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

WHEREFORE, Southern Bell respectfully requests that the Prehearing Officer issue a Temporary Protective Order exempting portions of Southern Bell's response to Item No. 1 of Public Counsel's Thirty-Second Set of Interrogatories from § 119.07(1), Florida Statutes, in accordance with Rule 25-22.006, Florida Administrative Code.

Respectfully submitted this 4th day of January, 1993.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY


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