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May 28, 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. 920260-TL, 900960-TL, 910163-TL, 910727-TL

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Motion for a Temporary Protective Order for its Response to Public Counsel's Thirty-First Request for Production of Documents. 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. Copies have been served on the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White
Nancy B. White (2)

6 Enclosures

cc: All Parties of Record
A. M. Lombardo
H. R. Anthony
R. D. Lackey

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DOCUMENT NUMBER-DATE

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FLORIDA PUBLIC SERVICE COMMISSION

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CERTIFICATE OF SERVICE

Docket No. 920260-TL

Docket No. 900960-TL

Docket No. 910163-TL

Docket No. 910727-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 28th day of May, 1993 to:

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Nancy B. White
(2)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of the Revenue Requirements and Rate Stabilization Plan of Southern Bell Telephone and Telegraph Company)	Docket No. 920260-TL
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In re: Show cause proceeding against Southern Bell Telephone and Telegraph Company for misbilling customers)	Docket No. 900960-TL
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In re: Petition on behalf of Citizens of the State of Florida to initiate investigation into integrity of Southern Bell Telephone and Telegraph Company's repair service activities and reports)	Docket No. 910163-TL
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In re: Investigation into Southern Bell Telephone and Telegraph Company's compliance with Rule 25-4.110(2), F.A.C., Rebates)	Docket No. 910727-TL Filed: May 28, 1993

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
MOTION FOR A TEMPORARY PROTECTIVE ORDER
FOR ITS RESPONSE TO PUBLIC COUNSEL'S THIRTY-FIRST
REQUEST FOR PRODUCTION OF DOCUMENTS

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 October 22, 1992, the Office of Public Counsel ("Public Counsel") served upon Southern Bell its Thirty-First Request for Production of Documents in the above captioned matter. Some of the material responsive to the document requests contain customer-specific information, such as address, phone number, and other information. This information is expressly considered to be

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proprietary and confidential business information pursuant to §§ 364.183 and 119.07(1)(W), 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 document requests 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 Rule 25-22.006(5)(c), Florida Administrative Code, file a detailed Motion for Protective Order specifically addressing the information identified.

4. 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 Public Counsel's Thirty-First Request for Production of Documents from § 119.07(1), Florida Statutes, in accordance with Rule 25-22.006, Florida Administrative Code.

Respectfully submitted this 28th day of May, 1993.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY

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