



**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 *1<sup>st</sup>* day of *July*, 1993  
to:

Robin Norton  
Division of Communications  
Florida Public Service  
Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0866

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

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

Michael J. Henry  
MCI Telecommunications Corp.  
MCI Center  
Three Ravinia Drive  
Atlanta, Georgia 30346-2102

Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter, Grandoff & Reeves  
315 South Calhoun Street  
Suite 716  
Tallahassee, FL 32301-1838  
atty for FIXCA

Richard D. Melson  
Hopping Boyd Green & Sams  
Post Office Box 6526  
Tallahassee, Florida 32314  
atty for MCI

Joseph Gillan  
J. P. Gillan and Associates  
Post Office Box 541038  
Orlando, Florida 32854-1038

Rick Wright  
Regulatory Analyst  
Division of Audit and Finance  
Florida Public Svc. Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0865

Patrick K. Wiggins  
Wiggins & Villacorta, P.A.  
Post Office Drawer 1657  
Tallahassee, Florida 32302  
atty for Intermedia and Cox

Peter M. Dunbar  
Haben, Culpepper, Dunbar  
& French, P.A.  
306 North Monroe Street  
Post Office Box 10095  
Tallahassee, FL 32301  
atty for FCTA

Laura L. Wilson, Esq.  
Messer, Vickers, Caparello,  
Madsen, Lewis & Metz, PA  
Post Office Box 1876  
Tallahassee, FL 32302  
atty for FPTA

Chanthina R. Bryant  
Sprint Communications Co.  
Limited Partnership  
3065 Cumberland Circle  
Atlanta, GA 30339

Michael W. Tye  
AT&T Communications of the  
Southern States, Inc.  
106 East College Avenue  
Suite 1410  
Tallahassee, Florida 32301

Dan B. Hendrickson  
Post Office Box 1201  
Tallahassee, FL 32302  
atty for FCAN

Benjamin H. Dickens, Jr.  
Blooston, Mordkofsky,  
Jackson & Dickens  
2120 L Street, N.W.  
Washington, DC 20037  
Atty for Fla Ad Hoc

C. Everett Boyd, Jr.  
Ervin, Varn, Jacobs, Odom  
& Ervin  
305 South Gadsen Street  
Post Office Drawer 1170  
Tallahassee, Florida 32302  
atty for Sprint

Florida Pay Telephone  
Association, Inc.  
c/o Mr. Lance C. Norris  
President  
Suite 202  
8130 Baymeadows Circle, West  
Jacksonville, FL 32256

Monte Belote  
Florida Consumer Action Network  
4100 W. Kennedy Blvd., #128  
Tampa, FL 33609

Bill L. Bryant, Jr., Esq.  
Foley & Lardner  
Suite 450  
215 South Monroe Street  
Tallahassee, FL 32302-0508  
Atty for AARP

Michael B. Twomey  
Gerald B. Curington  
Department of Legal Affairs  
Room 1603, The Capitol  
Tallahassee, FL 32399-1050

Mr. Douglas S. Metcalf  
Communications Consultants,  
Inc.  
631 S. Orlando Ave., Suite 250  
P. O. Box 1148  
Winter Park, FL 32790-1148

Mr. Cecil O. Simpson, Jr.  
General Attorney  
Mr. Peter Q. Nyce, Jr.  
General Attorney  
Regulatory Law Office  
Office of the Judge  
Advocate General  
Department of the Army  
901 North Stuart Street  
Arlington, VA 22203-1837

Mr. Michael Fannon  
Cellular One  
2735 Capital Circle, NE  
Tallahassee, FL 32308

Floyd R. Self, Esq.  
Messer, Vickers, Caparello,  
Madsen, Lewis, Goldman & Metz  
Post Office Box 1876  
Tallahassee, FL 32302-1876  
Attys for McCaw Cellular

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

Stan Greer  
Division of Communications  
Florida Public Svc. Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0863

*Flaminio R. Anthony*  
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(02)

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 )  
the Integrity of SOUTHERN BELL ) Filed: July 1, 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 SUPPLEMENTAL  
RESPONSES TO PUBLIC COUNSEL'S THIRD SET OF  
INTERROGATORIES ORIGINALLY FILED IN DOCKET NO. 910163-TL

BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, moves for a Temporary Protective Order, and states:

1. On June 6, 1991, the Office of Public Counsel ("Public Counsel") served upon Southern Bell its Third Set of Interrogatories, originally filed in Docket No. 910163-TL. The Third Set of Interrogatories contains Item Nos. 1-21. This information was considered by Southern Bell to be subject to the attorney-client privilege or work product doctrine or both, and Southern Bell declined to provide same. Public Counsel filed Motions to Compel this information, which were granted by the Prehearing Officer in Order No. 25054, issued on September 12, 1991. Southern Bell filed a Motion for Reconsideration of this order, which was denied by the full Commission on December 17, 1991

(See: Order No. 25483). Upon appeal, the Florida Supreme Court upheld the order of the Florida Public Service Commission requiring Southern Bell to divulge this information. (See: Denial of Petition in Case No. 80,004, dated February 4, 1993). Southern Bell has previously responded to items 1-11 and stated that it would need additional time to respond to items 12-21. Southern Bell is now responding to items 12-21.

2. Items 12 through 21 request information regarding customers affected by the alleged falsification of trouble reports. The information Public Counsel seeks is entitled to confidential treatment because it contains customer specific information, such as customer names, addresses and telephone numbers. Customer specific information is expressly deemed proprietary and confidential business information pursuant to §§ 364.183 and 119.07(1)(w), Florida Statutes.

3. If Public Counsel subsequently notifies Southern Bell that this proprietary information is to be used in a proceeding before the 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. The information as to which Southern Bell seeks confidential treatment has been treated as confidential and has not

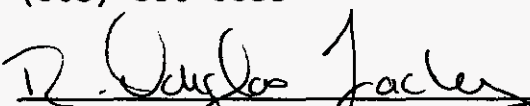
been disclosed to any third party except pursuant to orders of this Commission and the Florida Supreme Court.

WHEREFORE, Southern Bell respectfully requests that the Prehearing Officer issue a Temporary Protective Order exempting Southern Bell's responses to Item Nos. 12-21 of Public counsel's Third Set of Interrogatories from § 119.07(1), Florida Statutes, in accordance with Rule 25-22.006, Florida Administrative Code.

Respectfully submitted this 1st day of July, 1993.

ATTORNEYS FOR SOUTHERN BELL  
TELEPHONE AND TELEGRAPH COMPANY

  
\_\_\_\_\_  
HARRIS R. ANTHONY (og)  
J. PHILLIP CARVER  
c/o Marshall M. Criser  
400 - 150 Souther Monroe Street  
Tallahassee, Florida 32301  
(305) 530-5555

  
\_\_\_\_\_  
R. DOUGLAS LACKEY (os)  
NANCY B. WHITE  
4300 - 675 West Peachtree St., N.E.  
Atlanta, Georgia 30375  
(404) 529-3862  
(404) 529-5387