



GTE Telephone Operations

ORIGINAL
FILE COPY

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Ms. Blanca S. Bayo, Director
Division of Records & Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0850

May 27, 1994

Re: Docket No. 921074-TP
Expanded Interconnection Phase II and Local Transport
Restructure

Dear Ms. Bayo:

Please find enclosed for filing an original and one copy of GTE Florida Incorporated's Notice of Service of Responses to Citizens' Second Request for Production of Documents. Also enclosed are an original and fifteen copies of a Motion for Temporary Protective Order.

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ACK _____
AFA 2 _____
APP _____
CAF _____
Service has been made on the parties of record as evidenced by the Certificate of Service.

Reits
Very truly yours,

Kimberly Caswell
Kimberly Caswell

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KC:tas
Enclosures

ROH _____
SEC 1 RECEIVED & FILED

WAS _____
OTH *K.S. mas*
FPSC-BUREAU OF RECORDS

A part of GTE Corporation

DOCUMENT NUMBER-DATE
05218 MAY 27 1994
FPSC-RECORDS/REPORTING

DOCUMENT NUMBER-DATE
05217 MAY 27 1994
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Expanded Interconnection Phase II) Docket No. 921074-TP
and Local Transport Restructure) Docket No. 930955-TL
_____) Docket No. 940014-TL
Docket No. 940020-TL
Docket No. 931196-TL
Docket No. 940190-TL

Filed: May 27, 1994

**GTE FLORIDA INCORPORATED'S
MOTION FOR TEMPORARY PROTECTIVE ORDER**

Under Commission Rule 25-22.006(5)(c), GTE Florida Incorporated (GTEFL) requests a temporary protective order exempting from Florida Statutes section 119.07(1) certain material produced in response to the Office of Public Counsel's filing entitled Request for Production of Documents to GTE, dated April 22, 1994. GTEFL asks for interim protection of this information until the Office of Public Counsel (Public Counsel) tells the Company what, if any, confidential information will be used in this proceeding. At that time, GTEFL will file a detailed motion for permanent confidential classification of the confidential data.

By agreement with Charles Beck of the Office of Public Counsel, GTEFL will deposit the entire document production (both confidential and non-confidential) in GTEFL's Tallahassee office. Public Counsel representatives may then review the documents and designate what, if any, confidential information Public Counsel plans to use in this proceeding. At that time, GTEFL would file a more specific request for confidential treatment and a permanent protective order.

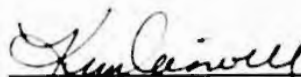
All of the information for which GTEFL seeks confidential protection falls within Florida Statutes section 364.183(3)(e),

which defines the terms "proprietary confidential business information" to include "information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of that information." The confidential information in this filing includes the Company's current and future competitive strategies, maps showing the placement of GTEFL facilities, and assessments about the impact of expanded interconnection and greater competition on GTEFL's business. In a competitive environment, any such knowledge obtained about a competitor can be used to the detriment of the entity to which it pertains. This unfair advantage skews the operation of the market, to the ultimate detriment of the ratepayer.

For these reasons, GTEFL asks the Commission to issue a temporary protective order covering the confidential information contained in documents produced by GTEFL in response to Public Counsel's document request.

Respectfully submitted on May 27, 1994.

By:



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Attorney for
GTE Florida Incorporated