

MARY JO PEED  
General Attorney

Southern Bell Telephone  
and Telegraph Company  
150 South Monroe Street  
Suite 400  
Tallahassee, Florida 32301  
(404) 529-7208

FILE COPY

February 22, 1995

Mrs. Blanca S. Bayo  
Director, Division of Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32301

RE: Docket No. 920260-TL

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Motion for a Temporary Protective Order. Please file these documents in the 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,

*Mary Jo Peed*  
Mary Jo Peed (mj)

ACK ✓  
ABA ~~1~~  
ATP 1  
CSE  
Norton  
Enclosures  
cc: All Parties of Record  
1 A. M. Lombardo  
4 R. G. Beatty  
R. D. Lackey  
1  
DKS

JP

DOCUMENT NUMBER-DATE  
02121 FEB 22 95  
FPSC-RECORDS/REPORTING

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 (Formerly FPSC Docket )  
Number 880069-TL) )  
\_\_\_\_\_ )

Docket No. 920260-TL  
Filed: February 22, 1995

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
MOTION FOR A TEMPORARY PROTECTIVE ORDER

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 in connection with its Responses to Office of Public Counsel's ("Public Counsel") First Set of Post-Settlement Interrogatories dated January 18, 1995.

On February 22, 1995, Southern Bell filed its Response to Public Counsel's First Set of Post-Settlement Interrogatories, portions of which are deemed to be confidential and proprietary by Southern Bell. Some of the documents that will be delivered to and reviewed by Public Counsel in connection with these responses to these interrogatories contain proprietary, confidential business information which should not be publicly disclosed. Thus, pursuant to the Commission's Rule on confidentiality, Rule 25-22.006(5)(c), Florida Administrative Code, Southern Bell moves that the Prehearing Officer issue a Temporary Protective Order exempting these documents from § 119.07(1), Florida Statutes. The proprietary information in question includes but is not limited to information concerning employee personnel information unrelated to compensation, duties,

02121 FEB 22 1995  
FPSC-RECORDS/REPORTING

qualifications or responsibilities. Once Public Counsel notifies Southern Bell that any of the proprietary documents are to be used in a proceeding for the Commission, Southern Bell will file a detailed Motion for Protective Order specifically addressing each of the documents identified in accordance with Rule 25-22.006, Florida Administrative Code.

WHEREFORE, Southern Bell respectfully requests the Commission to grant its Motion for Temporary Protective Order in regard to its Responses to Public Counsel's First Set of Post-Settlement Interrogatories dated January 18, 1995.

Respectfully submitted this 22nd day of February, 1995.

ATTORNEYS FOR SOUTHERN BELL  
TELEPHONE AND TELEGRAPH COMPANY

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ATTACHMENT B REDACTED VERSION

Southern Bell Tel. & Tel. Co.  
Docket No. 920260-TL  
Public Counsel's First Set of  
Interrogatories (Post Settlement)  
January 18, 1995  
Item No.: 1  
Page 1 of 1

Request: Please provide the name, title, former work location, reason for termination and date of termination for each Service Representative or management person terminated for ethics violations, failure to properly inform customers, falsification of sales, or or any other sales activities since December 31, 1993.

Response:

<u>Name</u>	<u>Title</u>	<u>Work Location</u>	<u>Reason for Termination</u>	<u>Date of Termination</u>
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PROPRIETARY RESPONSE

Southern Bell objects to this Interrogatory to the extent the information requested is proprietary confidential business information. Southern Bell has provided the proprietary data to the Commission Staff and the Public Counsel under a Request for Confidential Classification to be filed contemporaneously with the serving of Southern Bell's Interrogatory responses.

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General Attorney

Information Provided by: D. M. Mower, Director-Human Resources  
4KK1, Southern Bell Tower  
301 W. Bay Street  
Jacksonville, FL 32202

Southern Bell Tel. & Tel. Co.  
Docket No. 920260-TL  
Public Counsel's First Set of  
Interrogatories (Post Settlement)  
January 18, 1995  
Item No.: 2  
Page 1 of 1

Request: Please provide the name, title, former work location, reason for termination, and date of termination for each service technician or management person terminated since December 31, 1993 related to the falsification of any repair records or other reports or records.

Response:

<u>Name</u>	<u>Title</u>	<u>Work Location</u>	<u>Reason for Termination</u>	<u>Date of Termination</u>
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PROPRIETARY RESPONSE

Southern Bell objects to this Interrogatory to the extent the information requested is proprietary confidential business information. Southern Bell has provided the proprietary data to the Commission Staff and the Public Counsel under a Request for Confidential Classification to be filed contemporaneously with the serving of Southern Bell's Interrogatory responses.

\_\_\_\_\_  
General Attorney

Information Provided by: D. M. Mower, Director-Human Resources  
4KK1, Southern Bell Tower  
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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 22nd day of February, 1995  
to:

Robin Norton  
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(07)