

NANCY B. WHITE  
General Attorney

Southern Bell Telephone  
and Telegraph Company  
150 South Monroe Street  
Suite 400  
Tallahassee, Florida 32301  
(404) 529-5387

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May 15, 1995

FPSC-RECORDS/REPORTING

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.

ACK

AFA 2

APP \_\_\_\_\_

CAF \_\_\_\_\_

CML Norton

CTR \_\_\_\_\_ Enclosures

EAG \_\_\_\_\_ cc: All Parties of Record

LEG 1 A. M. Lombardo

LIN 5 R. G. Beatty

\_\_\_\_\_ R. D. Lackey

CYC \_\_\_\_\_

RDH Kaneon

SCH 1

WAT \_\_\_\_\_ RECEIVED & FILED

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FPSC-BUREAU OF RECORDS

Sincerely,

*Nancy B. White*

Nancy B. White

(02)

DOCUMENT NUMBER-DATE

04690 MAY 15 95

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of ) Docket No. 920260-TL  
the Revenue Requirements and Rate )  
Stabilization Plan of Southern ) Filed: May 15, 1995  
Bell Telephone and Telegraph )  
Company (Formerly FPSC Docket )  
Number 880069-TL) )

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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") Fifth Set of Post-Settlement Interrogatories dated April 14, 1995.

On May 11, 1995, Southern Bell filed its Response to Public Counsel's Third 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 settlements of lawsuits and other claims, as well as information concerning unregulated

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operations. 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 Fifth Set of Post-Settlement Interrogatories dated April 14, 1995.

Respectfully submitted this 15th day of May, 1995.

ATTORNEYS FOR SOUTHERN BELL  
TELEPHONE AND TELEGRAPH COMPANY

Robert A. Beatty (02)  
ROBERT G. BEATTY  
PHILLIP J. CARVER  
c/o Nancy Sims  
150 South Monroe Street  
Suite 400  
Tallahassee, Florida 32301  
(305) 530-5555

R. Douglas Lackey (2)  
R. DOUGLAS LACKEY  
NANCY B. WHITE  
4300 Southern Bell Center  
675 West Peachtree St., N.E.  
Atlanta, Georgia 30375  
(404) 529-3862  
(404) 529-5387

**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 15th day of May, 1995 to:

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

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

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

Kenneth A. Hoffman  
Messer, Vickers, Caparello,  
Madsen, Lewis & Metz, PA  
Post Office Box 1876  
Tallahassee, FL 32302  
atty for FPTA

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

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

Michael J. Henry  
MCI Telecommunications Corp.  
780 Johnson Ferry Road  
Suite 700  
Atlanta, Georgia 30342

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

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

Laura L. Wilson, Esq.  
Florida Cable  
Telecommunications Assn., Inc.  
310 North Monroe Street  
Tallahassee, FL 32301  
atty for FCTA

Chanthina R. Bryant  
Sprint Communications Co.  
Limited Partnership  
3100 Cumberland Circle  
Atlanta, GA 30339

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

Angela Green  
Florida Public  
Telecommunications Assn., Inc.  
125 South Gadsden Street  
Suite 200  
Tallahassee, FL 32301

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

Donald L. Bell, Esq.  
104 East Third Avenue  
Tallahassee, FL 32303  
Atty for AARP

Joseph Gillan  
J.P. Gillan & Associates  
P.O. Box 541038  
Orlando, FL 32854-1038

Mark Richard  
Attorney for CWA  
Locals 3121, 3122, and 3107  
304 Palermo Avenue  
Coral Gables, FL 33134

Gerald B. Curington  
Department of Legal Affairs  
2020 Capital Circle, SE  
Alexander Building, 2nd Floor  
Tallahassee, FL 32301

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

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

Norma B. White (63)