

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed Rule 25-24.845, )  
F.A.C., Customer Relations; )  
Rules Incorporated, and Proposed )  
Amendments to Rules 25-4.003, )  
F.A.C., Definitions; 25-4.110, )  
F.A.C., Customer Billing; 25- )  
4.118, F.A.C., Interexchange )  
Carrier Selection; 25-24.490, )  
F.A.C. Customer Relations; )  
Rules Incorporated. )

Docket No. 990002-TI

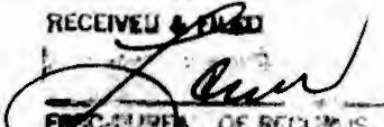
Filed: October 10, 1997

**MCI TELECOMMUNICATIONS CORPORATION'S  
MOTION FOR A TEMPORARY PROTECTIVE ORDER**

MCI Telecommunications Corporation (MCI), pursuant to Rule 25-22.006(6)(c), Florida Administrative Code, hereby files its Motion for Temporary Protective Order in connection with its Response to the Citizen's First Request for Production of Documents to MCI. In support of this motion, MCI states:

1. On October 10, 1997, MCI filed its Response to Citizen's First Request for Production of Documents and began producing documents pursuant to such request. The majority of the documents produced or to be produced are considered by MCI to be proprietary confidential business information pursuant to Section 364.183, Florida Statutes, or contain customer specific information which MCI has an obligation to protect from public disclosure pursuant to Section 364.24, Florida Statutes.

2. MCI has agreed to permit the Office of Public Counsel (OPC) to take possession of these documents for the purpose of determining what information, if any, is to be used in a proceeding before the Commission; provided that customer specific information will be produced only pursuant to subpoena. In this

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situation, Rule 25-22.006(6)(c) permits MCI to request a temporary protective order to exempt such documents from Section 119.07(1), Florida Statutes, and Rule 25-22.006(6)(b) exempts such documents from public disclosure while such a request is pending.

3. The proprietary confidential business information contained in these documents includes, but is not limited to: (1) internally prepared analyses, documents and e-mails which describe proprietary and confidential company practices and procedures which could be used to advantage by competitors within the telecommunications industry; (2) third-party verification documents containing proprietary business procedures used by a party other than MCI; and (3) customer-specific complaint information which contains material which MCI is obligated by Section 364.24 to protect from disclosure. Each of the documents which MCI regards as proprietary has been stamped "CONFIDENTIAL".

4. Once OPC notifies MCI that any of the proprietary documents are to be used in a proceeding before the Commission, MCI will file a detailed Motion for Protective Order with respect to such documents in accordance with the other provisions of Rule 25-22.006. MCI understands that to the extent OPC does not intend to use these documents in proceedings before the Commission, OPC will return such documents to MCI.

WHEREFORE, MCI moves the Commission to enter a Temporary Protective Order in regard to the portions of MCI's responses to the Citizen's First Request for Production of Documents which MCI

has identified as containing proprietary or confidential information.

RESPECTFULLY SUBMITTED this 10th day of October, 1997.

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by hand delivery (\*) or U.S. Mail this 10th day of October, 1997.

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