

ORIGINAL

Legal Department

HENRY B. WHITE
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October 10, 1997

Mrs. Bianca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32300

RE: Docket No. 970000-T1

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'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,

Nancy B. White (ke)
Nancy B. White

- ACK
- AFA
- APP
- CAF
- CMH
- CTR
- ENG
- LES
- LI
- CF
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- W-S
- OTH

Enclosures

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
W. J. Ellenberg

RECEIVED & FILED
[Signature]
EPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed Rule 25-24.845,)	DOCKET NO.: 970882-T1
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; 25-4.490, F.A.C.,)	FILED: October 10, 1997
Customer Relations; Rules)	
Incorporated.)	

BELLSOUTH TELECOMMUNICATIONS, INC.'S
MOTION FOR A TEMPORARY PROTECTIVE ORDER

BellSouth Telecommunications, Inc. ("BellSouth") files, pursuant to Rule 25-22.008(5)(c), Florida Administrative Code, its Motion for Temporary Protective Order in connection with its Responses to Office of Public Counsel's First Request for Production of Documents.

On September 10, 1997, BellSouth received Public Counsel's First Request for Production of Documents. Portions of the responses thereto are deemed to be confidential and proprietary by BellSouth. Some of the documents that have been delivered and will be delivered to and reviewed by Public Counsel in connection with these responses to these data requests contain proprietary, confidential business information which should not be publicly disclosed. Thus, pursuant to the Commission's Rule on confidentiality, Rule 25-22.008(5)(c), Florida Administrative Code, BellSouth moves that the Prehearing Officer issue a Temporary Protective Order exempting these documents from §

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119.07(1), Florida Statutes. The proprietary information contains customer specific information such as names, addresses, telephone numbers. Once Public Counsel notifies BellSouth that any of the proprietary documents are to be used in a proceeding for the Commission, BellSouth 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, BellSouth respectfully requests the Commission to grant its Motion for Temporary Protective Order in regard to its Responses to Public Counsel's First Request for Production of Documents.

Respectfully submitted this 10th day of October, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (ke)

ROBERT G. BEATTY

NANCY B. WHITE

c/o Nancy Sims

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William J. Ellenberg II (ke)

WILLIAM J. ELLENBERG II

J. PHILLIP CARVER

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Atlanta, Georgia 30375

(404)335-0710

**CERTIFICATE OF SERVICE
DOCKET NO. 970882-TI**

**I HEREBY CERTIFY that a true and correct copy of the foregoing was served
via U. S. Mail this 10th day of October, 1997 to the following:**

**Charles J. Beck
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street
Suite 812
Tallahassee, FL 32399-1400**

**Michael Gross
Office of the Attorney General
Department of Legal Affairs
The Capital, PL-01
Tallahassee, FL 32399-1050**

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Telecommunications Resellers
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***Nancy B. White* (kr)
Nancy B. White**