

ORIGINAL

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 25-4.803, )  
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: 970822-T1

Filed: October 13, 1997

**MOTION FOR TEMPORARY PROTECTIVE ORDER**

Pursuant to Commission Rule 25-22.006, F.A.C., and Section 364.183, Sprint-Florida, Incorporated ("Sprint-Florida" or "Movant") files this Motion for a Temporary Protective Order. In support the movant states as follows:

Movant is :

Sprint-Florida, Incorporated  
555 Lake Border Drive  
Apopka, Florida 32703

ACK \_\_\_\_\_

AFA \_\_\_\_\_

APP Caldwell

CAF 2

CMU \_\_\_\_\_

CTR \_\_\_\_\_

EAG \_\_\_\_\_

LEG FVI

LIN 5

OPC \_\_\_\_\_

RCH 1

SEC 1

WAS \_\_\_\_\_

OTH \_\_\_\_\_

Movant is represented by :

Charles J. Rehwinkel  
General Attorney  
1313 Blair Stone Rd.  
MC FTLHO0107  
Tallahassee, Florida 32301

DOCUMENT NUMBER-DATE

~~10407~~ OCT 13 5

FPSC-RECORDS/REPORTING

**On September 11, immediately after this Commission voted to grant the Petition for Rulemaking filed by the Attorney General and the Public Counsel ("Petitioners"), the Petitioners served their First Request for Production of Documents on Sprint-Florida. Many of the documents requested involve company records containing the names, addresses and telephone numbers of Sprint-Florida customers. Such information is, pursuant to Section 119.07(3)(r), Fla.Stat., confidential and exempt from public disclosure.**

**Sprint-Florida has not objected to providing this information. However, since the information is confidential as a matter of law, Sprint-Florida is compelled to maintain the confidentiality of the information. In this regard, Sprint-Florida requests the Commission to issue a temporary order requiring the Office of the Public Counsel and the Attorney General to maintain the confidentiality in accordance with Section 119.07(3)(r), Fla.Stat., for all customer name, address and telephone information contained in company records produced pursuant to discovery. This would not include similar information contained in complaints filed with public agencies such as the Commission and the FCC.**

**Sprint-Florida intends to follow this request up with a motion for a permanent protective order to the extent any confidential information produced is actually used in hearing or not returned to Sprint-Florida.**

**WHEREFORE, for the reasons stated above, Sprint-Florida respectfully request that the Florida Public Service Commission issue a Temporary Protective Order pursuant to Rule 25-22.006(c), F.A.C. and Section 364.183(2), Fla. Stat.**

**RESPECTFULLY SUBMITTED this 13h day of September, 1997.**



**Charles J. Rehwinkel  
General Attorney  
Sprint-Florida, Incorporated  
P.O. Box 2214  
MC FTLHO0107  
Tallahassee, Florida 32301**

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

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail this 13th day of October, 1997 to the following:

Richard D. Nelson, Esq.  
Hopping, Sams & Smith, P.A.  
P. O. Box 6526  
Tallahassee, Florida 32314

Michael J. Henry, Esq.  
Martha P. McMillin, Esq.  
MCI Telecommunications Corporation  
780 Johnson Ferry Road, Suite 700  
Atlanta, GA 30342

Diana Caldwell, Esq.  
Florida Public Service Commission  
Division of Appeals  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-7704

Ms. Beverly Y. Menard  
GTE Florida Incorporated  
106 East College Avenue, Suite 1440  
Tallahassee, Florida 32301-1440

Bellsouth Telecommunications, Inc.  
Robert G. Beatty  
Nancy B. White  
c/o Nancy H. Sims  
150 so. Monroe Street, Suite 400  
Tallahassee, Florida 32301

Ms. Harriet Eudy  
ALLTEL Florida, Inc.  
P.O. Box 550  
Live Oak, FL 32060-3343

Mr. Bill Thomas  
Gulf Telephone Company  
P.O. Box 1007  
Fort St. Joe, FL 32457-1007

Mr. Robert M. Post, Jr.  
Indiantown Telephone System, Inc.  
P.O. Box 277  
Tallahassee, Florida 34956-0277

Andrew O. Isar  
Director, Industry Relations  
Telecommunications  
Reseller Association  
4312 92<sup>nd</sup> Avenue, N.W.  
Gig Harbor, WA 98335-4461

Ms. Lynn G. Brewer  
Northeast Florida Telephone  
Company, Inc.  
P.O. Box 485  
Macclenny, Florida 32063-0485

Mr. Thomas McCabe  
Quincy Telephone Company  
P.O. Box 189  
Quincy, Florida 32353-0189

Mr. John H. Vaughan  
St. Joseph Telephone  
& Telegraph Company  
P.O. Box 220  
Port St. Joe, Florida 32456-0220

Ms. Laurie A. Maffett  
Frontier Communications  
of the South, Inc.  
180 S. Clinton Avenue  
Rochester, N.Y. 14646-0400

Ms. Lynn B. Hall  
Vista-United Telecommunications  
P.O. Box 10180  
Lake Buena Vista, Florida 32830-0180

Tracy Hatch  
AT&T Communications of the  
Southern States, Inc.  
101 North Monroe Street  
Tallahassee, Florida 32311

C. Everett Boyd, Jr.  
Ervin, Varn, Jacobs & Ervin  
P. O. Drawer 1170  
Tallahassee, Florida 32302

Michael A. Gross  
Assistant Attorney General  
Office of the Attorney General  
PL-01 The Capitol  
Tallahassee, FL 32399-1050

Charles J. Beck  
Deputy Public Counsel  
Office of Public Counsel  
c/o The Florida Legislature  
111 W. Madison Street Room 612  
Tallahassee, FL 32399-1400



Charles J. Rehwinkel  
Attorney for  
Sprint-Florida, Inc.  
P.O. Box 2214 MC FTLM00107  
Tallahassee, FL 32316-2214  
904/847-0244