

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Proposed Rule 25-24.845,)	DOCKET NO. 25-24.845 -PI
F.A.C., Customer Relations; Rules)	
Incorporated, and proposed amend-)	Filed: October 16, 1997
ments 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)	
<u>Incorporated.</u>)	

THE FURST GROUP, INC.'S REQUEST FOR TEMPORARY PROTECTIVE ORDER AND NOTICE OF INTENT TO REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATION

Pursuant to Commission Rule 25-22.006, Florida Administrative Code, and Section 364.183, Florida Statutes, The Furst Group, Inc., hereby files this Request for Temporary Protective Order and Notice of Intent to Request Specified Confidential Classification.

1. The Office of Public Counsel (OPC) filed with the Florida Public Service Commission on September 11, 1997, a request for production of documents on The Furst Group, Inc. The Furst Group, Inc., filed its Objections to and Request for Clarification of Citizens' First Request for Production of Documents on September 26, 1997.

2. Much of the information requested by OPC is proprietary and confidential business information under Section 364.183, Florida Statutes, and Rule 25-22.006, F.A.C. The Furst Group, Inc., has agreed to produce this proprietary information so OPC can review it and determine what, if any, will be used in this proceeding. The Furst Group, Inc., is, therefore, filing this Notice of Intent to Request Specified Confidential Classification

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 FPSC BUREAU OF RECORDS

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 FPSC-RECORDS/REPORTING

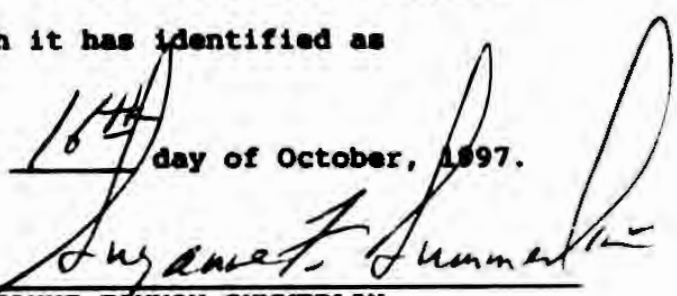
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of any proprietary documents identified by OPC to be used in this proceeding. The Furst Group, Inc., is also requesting a Temporary Protective Order to exempt these proprietary documents from Section 119.07, Florida Statutes. This proprietary information includes information related to The Furst Group, Inc.'s competitive business interests (such as internally prepared documents, analyses, and e-mails which describe company practices and marketing tools), proprietary information of a third-party verification company, trade secrets, and customer-specific complaint information.

3. After OPC reviews these documents and identifies those that are to be used in this proceeding, The Furst Group, Inc., will file a detailed Motion for Protective Order fulfilling the requirements of Rule 25-22.006, Florida Administrative Code, for specified confidential classification of those proprietary documents, if any.

WHEREFORE, The Furst Group, Inc., requests the Commission to grant its Motion for Temporary Protective Order in regard to those portions of its responses to OPC's First Set of Requests for Production of Documents which it has identified as proprietary and confidential.

Respectfully submitted this 16th day of October, 1997.


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CERTIFICATE OF SERVICE


I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to the following parties this 16th day of October, 1997.

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