

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. 970002-T1

Filed: October 18, 1997

**LCI'S NOTICE OF INTENT
TO REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATION
AND REQUEST FOR TEMPORARY PROTECTIVE ORDER**

Pursuant to Rule 25-22.006(6)(c), Florida Administrative Code and Section 364.183, Florida Statutes, LCI International Telecom Corp. (LCI) files this Notice of Intent to Request Specified Confidential Classification and Request for Temporary Protective Order.

1. On September 11, 1997, the Office of the Public Counsel (OPC) served its First Request for Production of Documents on LCI. LCI filed its initial objections to certain portions of the request on October 3, 1997.

2. Certain documents and information requested by OPC are subject to privilege, in that they are confidential and proprietary under Florida Statutes, Section 364.183, Florida Statutes, Rule 25-22.006, Florida Administrative Code, and rules governing discovery. Accordingly, LCI is filing this Notice of Intent to Request Confidential Classification. (Certain documents also include customer-specific account information which LCI is prohibited from disclosing, except pursuant to the

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requirements of a subpoena or court order, by Section 364.24, Florida Statutes. LCI has informed OPC that such documents will not be produced in the absence of such requirements.) The proprietary information includes, but is not limited to, trade secrets and information which, if disclosed, would harm LCI's business operations or its competitive posture and/or would harm ratepayers. LCI also moves for a Temporary Protective Order exempting these documents from Section 119.07, Florida Statutes.

3. If Public Counsel informs LCI that OPC intends to use any of the confidential and/or proprietary documents in a proceeding before the Commission, LCI will file a Motion for Permanent Protective Order in which it will address each of the documents for which protection is sought with specificity in accordance with Rule 25-22.006, Florida Administrative Code.

WHEREFORE, LCI requests the Commission to enter a Temporary Protective Order exempting the following documents encompassed by OPC's First Set of Requests for Production of Documents from Section 114.07, Florida Statutes.

Documents bearing Bates Stamp Nos.: 000001-000014, inclusive and 000036-001199, inclusive.


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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of LCI's foregoing Notice of Intent to Request Specified Confidential Classification and Request for Temporary Protective Order has been furnished by United States mail or hand delivery(*) this 16th day of October, 1997:

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