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PLEASE REPLY TO
TALLAHASSEE

October 16, 1997

VIA HAND DELIVERY

Ms. Blanca Bayó
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. ~~970000~~ TI - Joint Petition of Robert A. Butterworth, Attorney General, and the Citizens of the State of Florida, by and through the Office of Public Counsel for initiation of formal proceedings pursuant to Section 120.57(1), Florida Statutes, to investigate the practice of "slamming," i.e. the unauthorized change of a customer's presubscribed carrier, and to determine the appropriate remedial measures

Dear Ms. Bayó:

Enclosed are the original and 15 copies of LCI International Telecom Corp.'s Supplemental Notice of Intent to Request Specified Confidential Classification and Request for Temporary Protective Order in the above docket.

I have enclosed an extra copy of the above documents for you to stamp and return to me. Please contact me if you have any questions. Thank you for your assistance.

Sincerely,

Joseph A. McGlothlin

KCR _____
AFA _____
APP Caldwell
CAF 2
CMU _____
CTR _____
EAG JAM/pw
LEG 1 Encls.
LIN 5
CPC _____
ROH 1
SEC 1
WAS _____
OTH _____

cc: Pamela Melton (w/enclosures)

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

~~10960~~ OCT 23 5

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed Rule 25-24.845, F.A.C.)	
Customer Relations; Rules Incorporated,)	Docket No. 970882-TI
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.,)	Filed: October 23, 1997
Interexchange Carrier Selection; 25-24.490,)	
F.A.C., Customer Relations; Rules)	
Incorporated.)	

**LCI'S SUPPLEMENTAL 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 Supplemental Notice of Intent to Request Specified Confidential Classification and Request for Temporary Protective Order. In support, LCI states:

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 and confidential treatment, 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. Certain documents requested by OPC also include customer-specific account information which LCI is prohibited from disclosing, except pursuant to the requirements of a subpoena or court order, by

DOCUMENT NUMBER-DATE

10963 OCT 23 5

FPSC-RECORDS/REPORTING

Section 364.24, Florida Statutes. LCI informed OPC that such documents will not be produced in the absence of such a requirement. OPC has since served a subpoena for the subject documents. Such information is also entitled to confidential classification and protective order. The proprietary information therefore 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. On October 16, 1997, LCI filed a Notice of Intent to Request Specified Confidential Classification and Request for Temporary Protective Order relative to documents stamped with Nos. 000001-000014, inclusive and 000036-001199, inclusive. Since that time, LCI has identified additional documents responsive to OPC's First Request which are entitled to and require confidential treatment for the same reasons. Accordingly, LCI is filing this Supplemental Notice of Intent to Request Confidential Classification. LCI also moves for a Temporary Protective Order exempting these additional documents from Section 119.07, Florida Statutes.

3. If Public Counsel informs LCI that OPC intends to use any of the confidential, proprietary, and/or statutorily protected 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 classifying the following additional documents encompassed by OPC's First Set of Requests for Production of Documents as confidential and exempting them from Section 119.07, Florida Statutes.

Documents bearing Bates Stamp Nos.: 001200-001576.


A handwritten signature in black ink, appearing to read "Joseph A. McGlothlin", is written over a horizontal line.

**Joseph A. McGlothlin
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**Attorneys for LCI International Telecom
Corporation**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of LCI's foregoing Supplemental 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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Joseph A. McGlothlin