

ORIGINAL



AT&T

Marsha E. Rule  
Attorney

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December 12, 1997

Mrs. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Dear Mrs. Bayo:

Re: Docket No. 971492-TI

You will find enclosed an original and fifteen (15) copies of AT&T's Notice of Intent to Request Specified Confidential Classification and Request for Temporary and Permanent Protective Order for filing in the above-referenced docket.

Copies of the foregoing are being served on the parties of record in accordance with the attached certificate of service.

Yours truly,

Marsha E. Rule

- ICK
- MFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 1 \_\_\_\_\_
- LIN 5 \_\_\_\_\_
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1 \_\_\_\_\_
- WAS \_\_\_\_\_
- OTH Cy Mitchell

mr  
Enclosures  
cc: Parties of Record

DOCUMENT NUMBER-DATE  
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished by hand delivery  
this 12th day of December, 1997, to:

Charles J. Beck  
Office of the Public Counsel  
c/o The Florida Legislature  
111 West Madison Street  
Room 812  
Tallahassee FL 32399-1400

Michael A. Gross  
Assistant Attorney General  
Department of Legal Affairs  
PL-101, The Capitol  
Tallahassee, FL 32399-1050

John Bowman  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee FL 32399-0850



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Marsha E. Rule

UNION

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Robert A. Butterworth, )  
Attorney General, and the Citizens of the )  
State of Florida, by and through Jack Shreve,) )  
Public Counsel, against AT&T )  
Communications of the Southern States, )  
Inc. for slamming Robert Flint in violation )  
of Rule 25-4.118, F.A.C. )  
\_\_\_\_\_ )

Docket No. 971433-TI

Filed: 12/12/97

In re: Initiation of show cause proceedings )  
against AT&T of the Southern States, Inc. )  
and d/b/a/ Connect 'N Save for violation )  
of Rule 25-4.118, F.A.C., Interexchange )  
Carrier Selection )  
\_\_\_\_\_ )

Docket No. 971492-TI

AT&T's NOTICE OF INTENT  
TO REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATION  
AND REQUEST FOR TEMPORARY AND PERMANENT PROTECTIVE ORDER

Comes now AT&T Communications of the Southern States, Inc., (AT&T) and pursuant to Rule 22.006, Florida Administrative Code and Section 364.183, Florida Statutes, files this Notice of Intent to Request Specified Confidential Classification and Request for Temporary and Permanent Protective Order.

1. On December 2, 1997, the Office of the Public Counsel (OPC), on behalf of the Attorney General (AG) and Citizens of Florida, served upon AT&T a Notice of Deposition Duces Tecum in Docket No. 971433-TI for a deposition to be held on December 12, 1997.

2. Certain documents and information requested by OPC in its Notice of Deposition Duces Tecum are confidential and proprietary under Florida Statutes, Section

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364.183 and Rule 22.006, Florida Statutes. Because this information is proprietary, AT&T is filing this Notice of Intent to Request Confidential Classification in order to allow OPC and the AG to review and take possession of such documents and information without delay. AT&T also moves for a Temporary Protective Order exempting these documents from Section 119.07, Florida Statutes. The proprietary information includes, but is not limited to, trade secrets and information relating to AT&T's competitive interests.

3. Once Public Counsel or the Attorney General notifies AT&T that any of the proprietary documents are to be used in a proceeding before the Commission, AT&T 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, AT&T respectfully requests the Commission to grant its Motion for Temporary Protective Order in regard to documents produced in response to the Notice of Deposition Duces Tecum filed by OPC. It is AT&T's understanding that Docket No. 971433-TI will be consolidated or subsumed into Docket No. 971492-TI. AT&T therefore also requests that such Temporary Protective Order be granted and issued in both dockets or the surviving docket.

Respectfully submitted this 12th day of December, 1997.



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**ATTORNEY FOR AT&T  
COMMUNICATIONS OF THE  
SOUTHERN STATES, INC.**