

LAW OFFICES
McWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, RIEF & BARRAN, P.A.

ORIGINAL

LYNWOOD F. ARNOLD, JR.
JOHN W. BARRAN, JR.
C. THOMAS DAVIDSON
STEPHEN O. DECKER
LINDA E. JORGE
VICKI GORDON KAUFMAN
JOSEPH A. MCGLOTHLIN
JOHN W. McWHIRTER, JR.
RICHARD W. REEVES
FRANK J. RIEF, III
DAVID W. STEEN
PAUL A. STRASKE

100 NORTH TAMPA STREET, SUITE 2800
TAMPA, FLORIDA 33602-5126
MAILING ADDRESS: TAMPA
P.O. BOX 3350, TAMPA, FLORIDA 33601-3350
TELEPHONE (813) 224-0866
FAX (813) 221-1854
CABLE GRANDLAW
PLEASE REPLY TO:
TALLAHASSEE

TALLAHASSEE OFFICE
117 N. GADSDEN
TALLAHASSEE, FLORIDA 32301
TELEPHONE (904) 222-2525
FAX (904) 222-5006

January 9, 1998

VIA HAND DELIVERY

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

Re: Docket No. **971403-TI** - 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 LCI International for slandering David Howe in violation of Rule 25-4.118, F.A.C.

Dear Ms. Bayó:

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

ACK _____ I have enclosed an extra copy of the above document for you to stamp and
AFA _____ return to me. Please contact me if you have any questions. Thank you for your
APP 1 _____ assistance.

CAF _____

CMU _____

CTR _____

EAG _____

LEG 1 _____ JAM/jg

LIN _____

OPC _____ Enclosures

RCH _____

SEC 1 _____

WAS _____

OTH 1 _____
Shumard
McGlothlin

Sincerely,

Joe McGlothlin
Joseph A. McGlothlin

DOCUMENT NUMBER-DATE

00486 JAN-98

FPC-RECORDS/REPORTING

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 LCI International)
 for slamming David Howe in violation)
 of Rule 25-4.118, F.A.C.)

Docket No. 971403-TI

Filed: January 9, 1998

**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 December 9, 1997, the Office of the Public Counsel (OPC) and the Attorney General of the State of Florida (AG) jointly served their First Request for Production of Documents on LCI.

2. Certain documents and information requested by OPC and AG are subject to privilege, or 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 requirements of a subpoena or court order, by Section 364.24, Florida Statutes. LCI

DOCUMENT NUMBER-DATE

00486 JAN-98

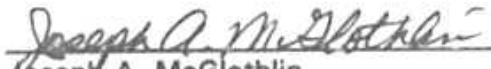
FPSC-RECORDS/REPORTING

has informed OPC and AG 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 199.07, Florida Statutes.

3. If Public Counsel or AG informs LCI that either 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 119.07, Florida Statutes.

Documents bearing Bates Stamp Nos. 000001-000046, inclusive; 000054; 000057-000058; and 000066-000073, inclusive.


Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301
Telephone: (850) 222-2525

Attorney for LCI International
Telecom Corp

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 9th day of January, 1998.

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

Michael A. Gross
Assistant Attorney General
Department of Legal Affairs
The Capitol, PL-01
Tallahassee, Florida 32399-1050

John Bowman*
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Room 390-M
Tallahassee, Florida 32399-0850


Joseph A. McGlothlin