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January 29, 1998

Ms. Blanca S. Bayó
Director, Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 970882-TI

Dear Ms. Bayó:

Enclosed for filing on behalf of MCI Telecommunications Corporation are the original and 15 copies of MCI's Second Motion For A Temporary Protective Order, in the above referenced docket.

By copy of this letter this document has been provided to the parties on the attached service list.

Very truly yours,

Richard D. Nelson
Richard D. Nelson

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CAF *2* Enclosures
CMU *2cc:* Per Certificate of Service
CTR _____
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by hand delivery (*) or U.S. Mail this 29th day of January, 1998.

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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. 970852-TI

Filed: January 29, 1998

**MCI TELECOMMUNICATIONS CORPORATION'S SECOND
MOTION FOR A TEMPORARY PROTECTIVE ORDER**

MCI Telecommunications Corporation (MCI), pursuant to Rule 25-22.006(6)(c), Florida Administrative Code, hereby files its Motion for Temporary Protective Order in connection with its Response to the Citizen's Second Request for Production of Documents to MCI. In support of this motion, MCI states:

1. On January 23, 1998, MCI filed its Response to Citizen's Second Request for Production of Documents and began producing documents pursuant to such request. The majority of the documents produced or to be produced are considered by MCI to be proprietary confidential business information pursuant to Section 364.183, Florida Statutes, or contain customer specific information which MCI has an obligation to protect from public disclosure pursuant to Section 364.24, Florida Statutes.

2. MCI has agreed to permit the Office of Public Counsel (OPC) to take possession of these documents for the purpose of

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determining what information, if any, is to be used in a proceeding before the Commission; provided that customer specific information will be produced only pursuant to subpoena. In this situation, Rule 25-22.006(6)(c) permits NCI to request a temporary protective order to exempt such documents from Section 119.07(1), Florida Statutes, and Rule 25-22.006(6)(b) exempts such documents from public disclosure while such a request is pending.

3. The proprietary confidential business information contained in these documents includes, but is not limited to customer-specific complaint information which contains material which NCI is obligated by Section 364.24 to protect from disclosure. Each of the documents which NCI regards as proprietary has been stamped "CONFIDENTIAL".

4. Once OPC notifies NCI that any of the proprietary documents are to be used in a proceeding before the Commission, NCI will file a detailed Motion for Protective Order with respect to such documents in accordance with the other provisions of Rule 25-22.006. NCI understands that to the extent OPC does not intend to use these documents in proceedings before the Commission, OPC will return such documents to NCI.

WHEREFORE, NCI moves the Commission to enter a Temporary Protective Order in regard to the portions of NCI's responses to the Citizen's Second Request for Production of Documents which

MCI has identified as containing proprietary or confidential information.

RESPECTFULLY SUBMITTED this 29th day of January, 1998.

HOPPING GREEN SANS & SMITH, P.A.

By: 

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and

**TOM BOND
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Attorneys for MCI