

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Comprehensive Review of the
Revenue Requirements and Rate
Stabilization Plan of Southern
Bell Telephone & Telegraph Company

Docket No. 920260

Filed June 8, 1998

ORIGINAL

**BELLSOUTH CORPORATION'S
RESPONSE AND OBJECTION TO THE PUBLIC SERVICE COMMISSION'S
AUDIT DOCUMENT/RECORD REQUEST NOTICE OF INTENT AND
MOTION FOR A TEMPORARY PROTECTIVE ORDER**

BellSouth Corporation (BSC) pursuant to Rule 25-22.034, Florida Administrative Code and Rule 1.280, Florida Rules of Civil Procedure, files its Response to the Public Service Commission's Audit Document/Record Request Notice of Intent dated May 19, 1998 and, pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, files its Motion for Temporary Protective Order and states:

1. Some of the documents that will be made available for review by the PSC contain proprietary, confidential business information that should not be publicly disclosed. Pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, BSC moves the Prehearing Officer to issue a Temporary Protective Order exempting these documents from Section 119.07(1), Florida Statutes.

These documents contain, among other things, nonregulated operations information, and other proprietary confidential business information. Such information is "proprietary confidential business information" pursuant to Section 364.183(3)(f), Florida Statutes. If the Public Service Commission subsequently notifies BSC that any of the proprietary documents are to be used in a proceeding before the Commission, BSC will, in accordance with Rule 25-22.006, Florida Administrative Code, file a Motion for Protective Order specifically addressing each of the documents identified.

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

06130 JUN-98

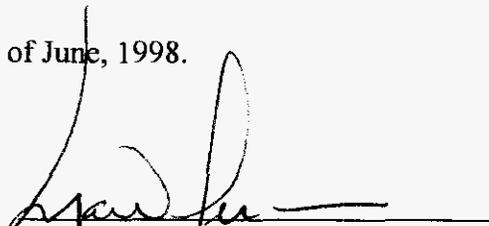
FPSC-RECORDS/REPORTING

ACK _____
AFA 1
APP _____
CAF _____
CMU _____
CTR _____
EAG _____
LEG 1
IN 5
JPC _____
RCH _____
SEC 1
VAS _____
TTH _____

2. The Public Service Commission, through its record request, is attempting to obtain information in the possession, custody, or control of an entity that is neither a party to this docket nor regulated by the PSC. Requests for Production under Rule 1.350, Florida Rules of Civil Procedure, may only be directed to parties, and any attempt by the PSC to obtain discovery from non-parties should be prohibited. Broward County v. Kerr, 454 So.2d 1068 (4th DCA 1984).

3. Subject to the response and Motion for Temporary Protective Order herein, documents to be made available will be produced for inspection and review at the office of the undersigned counsel upon reasonable notice.

Respectfully Submitted this 8th day of June, 1998.



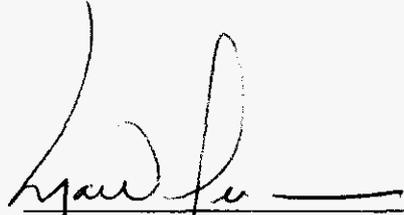
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by hand delivery to Mike Buckley, Florida Public Service Commission, 2540 Shumard Oak Blvd., Tallahassee, Florida 32399-0850, with copies served by U.S. Mail to the parties identified on the attached list this 24 day of June, 1998.



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