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Marsha E. Rule
Attorney

RECORDS AND
REPORTING

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August 31, 1998

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 the following for filing in the above-referenced docket:

- (1) AT&T's Response and Objections to the Third Set of Requests for Production of Documents by the Attorney General and the Citizens of Florida; and
- (2) AT&T's Notice of Intent to Request Specified Confidential Classification and Request for Temporary and Permanent Protective Order.

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

ACK _____
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[Signature]
FPSC-BUREAU OF RECORDS

Yours truly,

[Signature]
Marsha E. Rule

cc: Parties of Record

Resp 4 obj.
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DOCUMENT NUMBER-DATE
09508 AUG 31 1998

RECORDS AND REPORTING

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Initiation of Show Cause Proceedings)	Docket No. 971492-TI
against AT&T Communications of the)	
Southern States, Inc. and d/b/a Connect)	Filed: August 31, 1998
N' Save for violation of Rule 25-4.118,)	
F.A.C., Interexchange Carrier Selection.)	
)	
_____)	

**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. (hereinafter "AT&T") and pursuant to Rule 22.006, Florida Administrative Code, and Section 364.183, Florida Statutes, files its Notice of Intent to Request Specified Confidential Classification and Request for Temporary and Permanent Protective Order.

1. On July 22, 1998, the Office of Public Counsel (OPC), on behalf of the Attorney General and Citizens of Florida, served upon AT&T its Third Set of Requests for Production of Documents (17-18) in this docket. Thereafter, AT&T requested a subpoena for such information pursuant to Section 364.24, Florida Statutes, which OPC provided. AT&T will produce such documents on August 31, 1998, as specified in the subpoena.

2. Certain documents requested by OPC in its request for production are confidential and proprietary under Florida Statutes, Section 364.183 and Rule 22.006, Florida Administrative Code. Because this information is proprietary, AT&T is filing this Notice of Intent to Request Specified Confidential Classification in order to allow

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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 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 Third Set of Requests for Production of Documents (17-18) filed by OPC on July 22, 1998.

Respectfully submitted,



Marsha E. Rule
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(850) 425-6361 (fax)

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

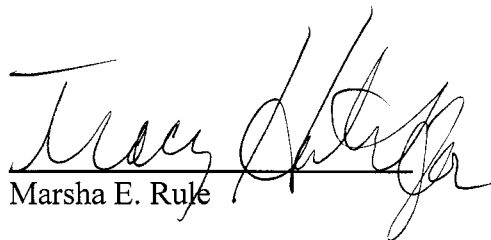
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by U. S. Mail or hand delivery to the following parties of record on this 31st day of August, 1998.

Cathy Bedell
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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Marsha E. Rule