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General Counsel-Florida

58 JAN -5 PM 4:41

BellSouth Telecommunications, Inc.
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Room 400
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RECORDS AND
REPORTING

January 5, 1999

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

Re: Docket No. 920260-TL

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Responses and Objections To Citizens' Third Set of Post-Settlement Requests For Production Of Documents (1997 Earnings) And Motion For A Temporary Protective Order, which we ask that you file in the captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

- ACK _____
- AFA Wright _____
- APP _____
- CAF _____
- CMU 2 _____
- CTR _____
- EAG _____
- LEG 1 _____
- LIN 5 _____
- OPC _____
- RCH _____
- SEC 1 _____
- WAS _____
- OTH _____

RECEIVED & FILED
[Signature]
FPSC BUREAU OF RECORDS

Sincerely,

Nancy B. White
Nancy B. White *(PW)*

Enclosures
cc: All parties of record
Marshall M. Criser, III
William J. Ellenberg II

DOCUMENT NUMBER - DATE

00113 JAN-5 99

FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of)
the Revenue Requirements and Rate) Docket No. 920260-TL
Stabilization Plan of Southern)
Bell Telephone and Telegraph)
Company)
_____) Filed: January 5, 1999

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
MOTION FOR A TEMPORARY PROTECTIVE ORDER**

COMES NOW BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), and files, pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, its Motion for Temporary Protective Order in connection with its Responses to Office of Public Counsel's ("Public Counsel") Third Set of Post-Settlement Interrogatories (1997 Earnings) dated December 1, 1998.


On January 5, 1999, BellSouth filed its Responses to Public Counsel's Third Set of Post-Settlement Interrogatories (1997 Earnings), portions of which are deemed to be confidential and proprietary by BellSouth. Some of the information that will be conveyed to and reviewed by Public Counsel in connection with the responses to these interrogatories contain proprietary, confidential business information which should not be publicly disclosed. Thus, pursuant to the Commission's Rule on confidentiality, Rule 25-22.006(5)(c), Florida Administrative Code, BellSouth moves that the Prehearing Officer issue a Temporary Protective Order exempting these documents from § 119.07(1), Florida Statutes. The proprietary information in question includes, but is not limited to, information concerning settlements of lawsuits and other claims, as

well as information concerning unregulated operations. Once Public Counsel notifies BellSouth that any of the proprietary documents are to be used in a proceeding for the Commission, BellSouth 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, BellSouth respectfully requests the Commission to grant its Motion for Temporary Protective Order in regard to its Responses to Public Counsel's Third Set of Post-Settlement Interrogatories (1997 Earnings) dated December 1, 1998.

Respectfully submitted this 5th day of January, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.



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**CERTIFICATE OF SERVICE
Docket No. 920260-TL**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by

U.S. Mail this 5th day of January, 1999 to:

=====

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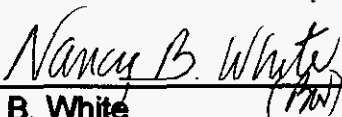
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