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April 1, 1999

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Betty Easley Conference Center, Room 110  
Tallahassee, Florida 32399-0850

**HAND DELIVERY**

RECEIVED-FPSC  
99 APR - 1 PM 4: 33  
RECORDS AND REPORTING

Re: Docket No. 981247-TI

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of American Nortel Communications, Inc. ("ANC") are the original and fifteen copies of ANC's Motion for Temporary Protective Order.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,

*John R. Ellis*  
John R. Ellis

**RECEIVED & FILED**  
*[Signature]*  
**FPSC-BUREAU OF RECORDS**

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF 1 JRE/rl
- CMU** \_\_\_\_\_ Enclosures
- CTR \_\_\_\_\_ cc: All Parties of Record
- EAG \_\_\_\_\_
- LEG 1 Trib.3
- LIN \_\_\_\_\_
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1 \_\_\_\_\_
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

DOCUMENT NUMBER-DATE  
04224 APR-1 99  
FPSC-RECORDS/REPORTING

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Initiation of show cause )  
proceedings against American )  
Nortel Communications, Inc. for )  
violation of Rule 25-4.118, )  
F.A.C., Interexchange Carrier )  
Selection. )  
\_\_\_\_\_ )

Docket No. 981247-TI

Filed: April 1, 1999

**AMERICAN NORTEL COMMUNICATIONS, INC.'S  
MOTION FOR TEMPORARY PROTECTIVE ORDER**

American Nortel Communications, Inc. ("ANC"), by and through its undersigned counsel and pursuant to Section 364.24(2), Florida Statutes and Rule 25-22.006(6), Florida Administrative Code, moves the Florida Public Service Commission ("Commission") for a temporary protective order in this docket, and as grounds therefor, states as follows:

1. Florida's Citizens' first set of requests for production of documents was served on ANC on January 20, 1999. Request No. 2 asks for all documents relating to the unauthorized change of Ms. Belen Denis' primary interexchange carrier to ANC.

2. Among the documents to be produced by ANC in response to this request is Ms. Denis' call detail record for dates in November, 1998, consisting of one page. Such customer account information is required to be treated as confidential pursuant to Section 364.24(2), Florida Statutes.

3. By this motion ANC requests that the document identified above and provided to counsel for Florida's Citizens be granted the protection of a temporary protective order as provided for by Rule 25-22.006(6)(c), Florida Administrative Code. This temporary protective order will protect the document from disclosure until counsel for Florida's Citizens completes its review of the

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

document. Once its review is completed, counsel for Florida Citizens will notify ANC whether it intends to use the document in this docket. If so, ANC, in accordance with Rule 25-22.006(6)(a), will request proprietary confidential treatment of the document, and if not, the document will be return to ANC by counsel for Florida's Citizens pursuant to Rule 25-22.006(6)(c).

WHEREFORE, ANC respectfully moves the Commission for a temporary protective order covering the above-described document provided to counsel for Florida's Citizens in response to request no. 2 of Florida's Citizens' first set of requests for production of documents.

Respectfully submitted,

  
\_\_\_\_\_

KENNETH A. HOFFMAN, ESQ.

JOHN R. ELLIS, ESQ.

Rutledge, Ecenia, Purnell & Hoffman, P.A.

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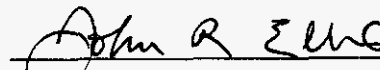
American Nortel Communications, Inc.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a copy of foregoing was furnished by United States Mail this 1st day of April, 1999:

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\_\_\_\_\_  
JOHN R. ELLIS

anc.protect