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Legal Department

MICHAEL P. GOGGIN  
General Attorney

99 DEC 20 PM 4:37

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(305) 347-5561

RECORDS AND  
REPORTING

December 20, 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. 981444-TP (Data Request)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Response to Petition to Inspect and Examine Material Claimed to be Confidential, which we ask that you file in the above-referenced docket.

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.

Sincerely,

*Michael P. Goggin*  
(M)

Michael P. Goggin

Enclosures

cc: All parties of record  
Marshall M. Criser III  
R. Douglas Lackey  
Nancy B. White

- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAE \_\_\_\_\_
- CMU Aleri
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG I
- MAS \_\_\_\_\_
- OPC \_\_\_\_\_
- RRR \_\_\_\_\_
- SEC I
- WAW \_\_\_\_\_
- OTH \_\_\_\_\_

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DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Number Utilization Study: ) Docket No. 981444-TP  
Investigation into Number Conservation )  
Measures )  
\_\_\_\_\_ ) Filed: December 20, 1999

**BELLSOUTH TELECOMMUNICATIONS, INC.'s RESPONSE TO  
PETITION TO INSPECT AND EXAMINE MATERIAL  
CLAIMED TO BE CONFIDENTIAL**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 28-106.204, Florida Administrative Code, hereby files its Response to Petition to Inspect and Examine Material Claimed to Be Confidential filed by the Office of Public Counsel ("OPC").

1. On December 13, 1999, the Citizens of Florida, by and through the Office of Public Counsel, filed a petition to inspect certain confidential information filed in this matter by, among others, BellSouth Telecommunications, Inc.

2. BellSouth does not object to permitting OPC to inspect the confidential information of BellSouth identified in OPC's petition provided an appropriate protective order is first entered.

3. BellSouth hereby requests that a protective order be entered by the Florida Public Service Commission ("Commission") permitting OPC to inspect the information identified in its petition solely for purposes of this docket. The order should specify that access to the information is limited to those individuals at OPC who are actively participating in this docket, and that each such individual is required to review the protective order prior to receiving access to the information, and to execute a form acknowledging that the individual has read and understands the protective order and agrees to be bound by its terms. The

DOCUMENT NUMBER-DATE


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FPSC-RECORDS/REPORTING

Order should further specify that OPC must retain copies of all such executed acknowledgement forms. In addition, the Order should require OPC to return or destroy any document, including notes or other documents created by OPC, that incorporates or includes any of BellSouth's confidential information at the conclusion of this proceeding.

Respectfully submitted this 20th day of December, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
\_\_\_\_\_  
NANCY B. WHITE (sm)  
MICHAEL P. GOGGIN  
c/o Nancy Sims  
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\_\_\_\_\_  
R. Douglas Lackey  
675 West Peachtree Street, N.E.  
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Atlanta, Georgia 30375  
(404) 335-0747

**CERTIFICATE OF SERVICE**  
**Docket No. 981444-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U.S. Mail this 20<sup>th</sup> December, 1999 to the following:

American Network Exchange, Inc.  
Amy Gross  
100 W. Lucerne Circle, #100  
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AT&T Communications of the Southern  
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Tracy Hatch  
Marsha Rule  
101 North Monroe Street, Suite 700  
Tallahassee, FL 32301-1549  
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North Palm Beach, FL 33408  
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Atty. for Omnipoint

Senate Committee on Regulated  
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