

MICHAEL P. GOGGIN
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JUN - 9 PM 11:31
RECORDS AND REPORTING

ORIGINAL

June 9, 2000

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

Re: 991378-TL (Show Cause Docket)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion for a Temporary Protective Order for Citizens' Second Set of Interrogatories, which we ask that you file in the above-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.

Sincerely,

Michael P. Goggin
Michael P. Goggin

MPG/vf

- APP
- CAF
- CMP
- COM
- CTR
- ECR
- LEG
- OPC
- PAI
- RGO
- SEC
- SER
- OTH

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

RECEIVED & FILED
MM
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
07094 JUN-98
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Initiation of show cause)
proceedings against BellSouth)
Telecommunications, Inc., for)
violation of service standards.)
_____)

Docket No.: 991378-TL

Filed: June 9, 2000

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
MOTION FOR A TEMPORARY PROTECTIVE ORDER
FOR CITIZENS' SECOND SET OF INTERROGATORIES**

COMES NOW BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), and files, pursuant to Rule 25-22.006(6)(c), Florida Administrative Code, its Motion for Temporary Protective Order in connection with its Responses to Florida's Citizens' ("Citizens'") Second Set of Interrogatories, dated May 10, 2000.

On June 9, 2000, BellSouth served its Responses to Citizens' Second Set of Interrogatories, portions of which are deemed to be confidential and proprietary by BellSouth. Some of the information that will be conveyed to and reviewed by Citizens' in connection with the responses to these interrogatories includes proprietary, confidential business information which should not be publicly disclosed. Thus, pursuant to Rule 25-22.006(6)(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, marketing information. Once Citizens' notifies BellSouth that any of the proprietary documents are to be used in a proceeding for the Commission,

DOCUMENT NUMBER-DATE

07094 JUN-98

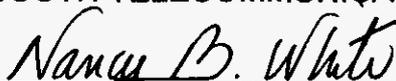
FPSC-RECORDS/REPORTING

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.

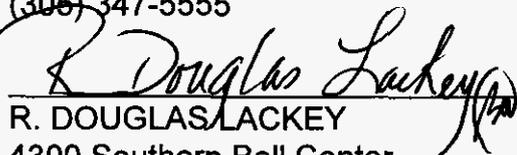
WHEREFORE, BellSouth respectfully requests that the Commission grant its Motion for Temporary Protective Order in regard to its Responses to Citizens' Second Set of Interrogatories dated May 10, 2000.

Respectfully submitted this 9th day of June, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.



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Atlanta, Georgia 30375
(404) 335-0747

#215429

CERTIFICATE OF SERVICE
Docket No. 991378-TL

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

(*) Hand Delivery and U.S. Mail this 9th day of June, 2000 to the following:

Walter D'Haeseleer, Director
Division of Communications
Florida Public Service Commission
2540 Shumard Oak Boulevard
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Donna Clemons, Staff Counsel
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of the State of Florida


Michael P. Goggin