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Legal Department

MICHAEL P. GOGGIN
General Attorney

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

RECORDS AND
REPORTING

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 Request for Production of Documents, 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

- APP _____
- CAF _____
- CMP _____
- COM _____MPG/mf
- CTR _____
- ECR _____
- LEG _____
- OPC _____
- PAI _____
- RCO _____
- SEC 1
- SER _____
- OTH Kg

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

DOCUMENT NUMBER-DATE

07095 JUN-98

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Initiation of show cause)	Docket No.: 991378-TL
proceedings against BellSouth)	
Telecommunications, Inc., for)	
violation of service standards.)	
_____)	Filed: June 9, 2000

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
MOTION FOR A TEMPORARY PROTECTIVE ORDER
FOR CITIZENS' SECOND REQUEST FOR PRODUCTION OF DOCUMENTS**

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 Request for Production of Documents, dated May 10, 2000.

On June 9, 2000, BellSouth served its Responses to Citizens' Second Request for Production of Documents, 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 requests include 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
07095 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.

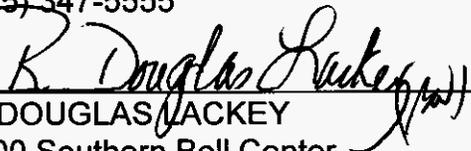
WHEREFORE, BellSouth respectfully requests that the Commission grant its Motion for Temporary Protective Order in regard to its Responses to Citizens' Second Request for Production of Documents, dated May 10, 2000.

Respectfully submitted this 9th day of June, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE
MICHAEL P. GOGGIN
c/o Nancy Sims
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(305) 347-5555



R. DOUGLAS MACKAY
4300 Southern Bell Center
675 West Peachtree St., N.E.
Atlanta, Georgia 30375
(404) 335-0747

#215847

**CERTIFICATE OF SERVICE
Docket No. 991378-TL**

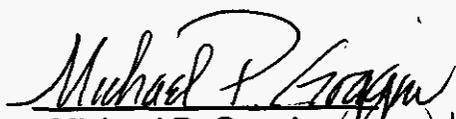
I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

(*) 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
Tallahassee, FL 32399-0850

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Attorney for the Citizens
of the State of Florida


Michael P. Goggin