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Legal Department

MICHAEL P. GOGGIN
General Attorney

00 JUL 19 PM 4:31

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

RECORDS AND
REPORTING

July 19, 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 its Responses to Citizens' Third Request for Production of Documents, which we ask that you file in the above-captioned 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
Michael P. Goggin

APP _____ MPG/vf

CAF _____

CMP _____

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CTR _____

ECR _____

LEG 1 _____

OPC _____

PAI _____

RGO _____

SEC 1 _____

SER _____

OTH _____

Rg

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

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FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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**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 19th day of July, 2000 to the following:

Walter D'Haeseleer, Director
Division of Communications
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Donna Clemons, Staff Counsel
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Charles J. Beck (*)
Deputy Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400
Attorney for the Citizens
of the State of Florida



Michael P. Goggin

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: July 19, 2000

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
MOTION FOR A TEMPORARY PROTECTIVE ORDER
FOR CITIZENS' THIRD 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'") Third Production of Documents, dated June 16, 2000.

On July 19, 2000, BellSouth served its Responses to Citizens' Third Production of Documents, which are deemed to be confidential and proprietary by BellSouth. The information that will be conveyed to and reviewed by Citizens' in connection with the Responses to these requests for production of documents 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, financial information. Once Citizens' notifies BellSouth that any of the proprietary documents are to be used in a proceeding for the Commission,

DOCUMENT NUMBER-DATE

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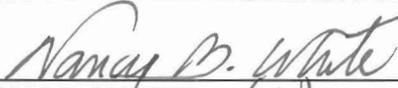
FPSC-RECORDS/REPORTING

BellSouth will file a detailed Motion for Protective Order specifically addressing 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' Third Production of Documents.

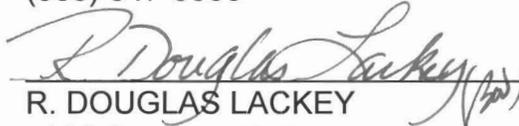
Respectfully submitted this 19th day of July, 2000.

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



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