

NANCY B. WHITE
General Counsel - Florida

BellSouth Telecommunications, Inc.
150 South Monroe Street
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January 24, 2001

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

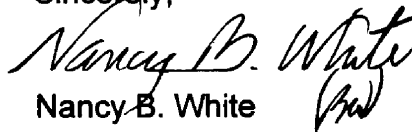
Re: Docket No. 990362-TI (Show Cause Against GTE)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion for Protective Order, which we ask that you file in the 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,


Nancy B. White

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey

DOCUMENT NUMBER-DATE
01088 JAN 24 01
FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE
Docket No. 990362-TI**

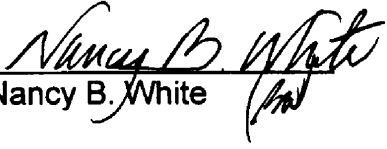
I HEREBY CERTIFY that a true and correct copy of the foregoing was served via (*) Hand Delivery and U. S. Mail this 24th day of January, 2001 to the following:

Lee Fordham
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
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Nancy B. White

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Initiation of Show Cause Proceeding) Docket No. 990362-TI
Against GTE Communications)
Corporation for Apparent Violation of)
Rule 25-4.118, F.A.C., Local, Local)
Toll, or Toll Provider Selection.)
_____) Filed: January 24, 2001

**BELLSOUTH TELECOMMUNICATIONS, INC.'s
MOTION FOR PROTECTIVE ORDER**


BellSouth Telecommunications, Inc., ("BellSouth") pursuant to Rule 28-106.206, *Florida Administrative Code*, and Rule 1.280, *Florida Rules of Civil Procedure*, files the following response to Citizens' Notice of Intent to Serve Subpoena, dated January 5, 2001 and states:

MOTION FOR TEMPORARY PROTECTIVE ORDER

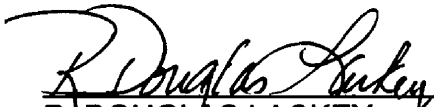
Some of the documents that will be delivered to or made available for review by Public Counsel contain proprietary, confidential business information that should not be publicly disclosed. Thus, pursuant to Rule 25-22.006(6)(c), *Florida Administrative Code*, BellSouth moves the Prehearing Officer to issue a Temporary Protective Order exempting these documents from § 119.07(1), *Florida Statutes*. These documents contain, among other things, customer specific information, and other proprietary confidential business information. Such information is specifically included as proprietary confidential business information pursuant to § 364.183(3), *Florida Statutes*. If Public Counsel subsequently notifies BellSouth that any of the proprietary documents are to be used in a proceeding before the Commission, BellSouth will, in accordance with Rule 25-22.006(a), *Florida Administrative Code*, file a detailed Motion for Protective Order specifically addressing each of the documents identified.

Respectfully submitted this 24th day of January, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.



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