

ORIGINAL

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October 31, 2002

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COMMISSION
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Mrs. Blanca S. Bayó
Director, Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 001503-TP (Number Pooling Trials)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Motion for Temporary Protective Order of BellSouth's Revised Responses to Citizens' First Request for Production of Documents Nos. 1 and 5, 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,

James Meza III
James Meza III (EM)

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

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CERTIFICATE OF SERVICE
Docket No. 001503-TP

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

(*) Hand Delivery and U.S. Mail this 31st day of October, 2002 to the following:

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James Meza III (KA)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Cost Recovery and)
Allocation of Issues for Number) Docket No. 001503-TP
Pooling Trials in Florida)
_____) Filed: October 31, 2002

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
MOTION FOR A TEMPORARY PROTECTIVE ORDER**

BellSouth Telecommunications, Inc. ("BellSouth"), files, pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, its Motion for Temporary Protective Order in connection with its Revised Responses to Florida Citizen's First Set of Requests for Production of Documents Nos. 1 and 5), dated May 29, 2002.

On July 19, 2002, BellSouth filed its Responses to Citizen's First Set of Requests for Production No. 5 along with a Motion for Temporary Protective Order, and on August 5, 2002, BellSouth filed its Responses to Citizen's First Set of Requests for Production Nos. (1-4) along with a Motion for Temporary Protective Order. Today, BellSouth is filing its Revised Responses to Citizens' First Requests for Production Nos. 1 and 5. Some of the information that will be conveyed to and reviewed by Public Counsel in connection with the responses to these requests contain proprietary, confidential business information which should not be publicly disclosed. Thus, pursuant to the Commission's Rule on confidentiality, Rule 25-22.006(5)(c), Florida Administrative Code, BellSouth requests 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, cost information. If Public Counsel notifies BellSouth that any of the proprietary documents are to be used

in a proceeding before the Commission, 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 Revised Responses to Citizen's First Set of Requests for Production of Documents Nos. 1 and 5, dated May 29, 2002.

Respectfully submitted this 31st day of October, 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.



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