

**Matilda Sanders**

From: Woods, Vickie [Vickie.Woods2@bellsouth.com]  
 Sent: Friday, November 17, 2006 3:27 PM  
 To: Filings@psc.state.fl.us  
 Subject: 060598-TL BellSouth's Motion for Temporary Protective Order  
 Importance: High  
 Attachments: MFPO.pdf

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- A. Vickie Woods  
 Legal Secretary to James Meza III and Manuel Gurdian  
 BellSouth Telecommunications, Inc.  
 150 South Monroe Street  
 Suite 400  
 Tallahassee, Florida 32301  
 (305) 347-5560  
vickie.woods2@bellsouth.com
- B. Docket No. 060598-TL: In Re: Petition to recover 2005 tropical system related costs and expenses by BellSouth Telecommunications, Inc.
- C. BellSouth Telecommunications, Inc.  
 on behalf of Manuel A. Gurdian
- D. 4 pages total (including letter, pleading and certificate of service)
- E. BellSouth Telecommunications, Inc.'s Motion for Temporary Protective Order  
 .pdf version attached

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KimP.  
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 [initials]

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Legal Department

Manuel A. Gurdian  
Attorney

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

November 17, 2006

Blanca S. Bayó  
Division of the Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Docket No. 060598-TL: Petition by BellSouth Telecommunications, Inc., pursuant to Florida Statutes §364.051(4), to Recover 2005 Tropical System Related Costs and Expenses**

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Motion for Temporary Protective Order, which we ask that you file in the captioned docket.

Copies of this letter will be served to the parties shown on the attached Certificate of Service.

Sincerely,



Manuel A. Gurdian

cc: Jerry D. Hendrix  
E. Earl Edenfield, Jr.  
James Meza III

DOCUMENT NUMBER-DATE

10573 NOV 17 8

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**CERTIFICATE OF SERVICE**  
**Docket No. 060598-TL**

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

(\*) Electronic Mail and Federal Express this 17th day of November, 2006 to the following:

Patrick Wiggins  
Adam Teitzman  
Felicia West  
Theresa Lee Eng Tan  
Staff Counsels  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[pwiggins@psc.state.fl.us](mailto:pwiggins@psc.state.fl.us)  
[ateitzma@psc.state.fl.us](mailto:ateitzma@psc.state.fl.us)  
[fbanks@psc.state.fl.us](mailto:fbanks@psc.state.fl.us)  
[ltan@psc.state.fl.us](mailto:ltan@psc.state.fl.us)

NuVox Communications, Inc.  
Susan J. Berlin (+)  
Two North Main Street  
Greenville, SC 29601  
Phone: 864-331-7323  
FAX: 864-672-5105  
[sberlin@nuvox.com](mailto:sberlin@nuvox.com)



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Manuel A. Gurdian

(+) Signed Protective Agreement

Charlie Beck  
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Office of Public Counsel  
111 West Madison Street, Room 812  
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Represents NuVox  
Represents CompSouth

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition by BellSouth Telecommunications, Inc., ) Docket No. 060598-TL  
pursuant to Florida Statutes § 364.051(4) to Recover )  
2005 Tropical System Related Costs and Expenses )  
November 17, 2006

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

COMES NOW BellSouth Telecommunications, Inc. ("BellSouth"), and files, pursuant to Rule 25-22.006(6)(c), Florida Administrative Code, a Motion for Temporary Protective Order ("Motion") in connection with the Surrebuttal Testimony of Kathy K. Blake, Ronald L. Hilyer and C.S. Pendergrass.

On November 17, 2006, BellSouth filed the Surrebuttal Testimony of Kathy K. Blake, Ronald L. Hilyer and C.S. Pendergrass, 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 Surrebuttal Testimony contains 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 moves the Prehearing Officer to 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, confidential business and financial information related to the following: tropical system related expenses BellSouth experienced in 2005, specific categories of BellSouth's retail line counts, hypothetical storm reserve analysis, and prior years' storm costs. Once OPC notifies BellSouth that any of the proprietary documents are to be used in a proceeding for the Commission, BellSouth will file a detailed Motion for Protective Order

DOCUMENT NUMBER-DATE

10573 NOV 17 8

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specifically addressing each of the documents identified in accordance with Rule 25-22.006, Florida Administrative Code.

Counsel for BellSouth contacted counsel for OPC on November 17, 2006 and advises that OPC does not object to the Motion but that OPC reserves the right to challenge the confidential status of any particular document.

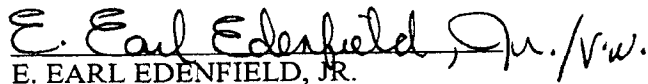
WHEREFORE, BellSouth respectfully requests the Commission to grant its Motion for Temporary Protective Order in regard to the Surrebuttal Testimony of Kathy K. Blake, Ronald L. Hilyer and C.S. Pendergrass filed on November 17, 2006.

Respectfully submitted this 17th day of November, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.



JAMES MEZA III  
MANUEL A. GURDIAN  
c/o Nancy H. Sims  
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(305) 347-5558



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