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: <u>Docket No. 060598-TL</u>: 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

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
ateitzma@psc.state.fl.us
Itan@psc.state.fl.us

Charlie Beck
Deputy Public Counsel
Office of Public Counsel
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
Phone: (850) 488-9330
Fax No. (850) 488-4491
Beck.Charles@leg.state.fl.us

Vicki Gordon Kaufman (+)
Moyle Flanigan Katz Raymond & Sheehan, PA
118 North Gadsden Street
Tallahassee, FL 32301
(850) 681-3828
vkaufman@moylelaw.com
Represents NuVox
Represents CompSouth

NuVox Communications, Inc. Susan J. Berlin (+) Two North Main Street Greenville, SC 29601 Phone: 864-331-7323 FAX: 864-672-5105

sberlin@nuvox.com

Manuel A. Gurdian

(+) Signed Protective Agreement

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

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

150 So. Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558

E. EARL EDENFIELD, JR

Suite 4300

675 W. Peachtree St., NE

Atlanta, GA 30375

(404) 335-0763

658584