

ORIGINAL

Timolyn Henry

From: Woods, Vickie [Vickie.Woods2@bellsouth.com]
Sent: Friday, December 01, 2006 1:24 PM
To: Filings@psc.state.fl.us
Subject: 060598-TL BellSouth's Motion for Temporary Protective Order (for its Revised Response to Citizens' First Set of Interrog. No. 4 and First RFP No. 2)
Importance: High
Attachments: MFTPO_Ci.pdf

CMP 1
COM
CTR Citizens' First Set
ECR
GCL 1
OPC
RCA
SCR
SGA
SEC 1
OTH Kim P. Lockard

A. Vickie Woods
Legal Secretary to James Meza III and Manuel Gurdian
BellSouth Telecommunications, Inc.
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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 (for its Revised Response to Citizens' First Set of Interrog. No. 4 and First RFP No. 2)
.pdf version attached

<<MFTPO_Ci.pdf>>

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(CONF. DN 11082-06

DOCUMENT NUMBER-DATE

11064 DEC-1 8

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ORIGINAL

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Attorney

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December 1, 2006

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

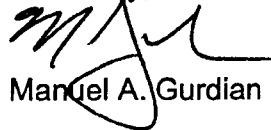
Re: **Docket No. 060598-TL: Petition by BellSouth
Telecommunications, Inc., pursuant to Florida Statutes
§364.051(4), to Recover 2005 Tropical System Related Costs
and Expenses**

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Motion for Temporary Protective Order for its *Revised Responses to Citizens' First Set of Interrogatories, Item No. 4* and First Request for Production of Documents, Item No. 2, 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

11064 DEC-1 8

FPSC-COMMISSION CLERK

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 First Class U. S. Mail this 1st day of December, 2006 to the following:

Patrick Wiggins
Adam Teitzman
Felicia West
Theresa Lee Eng Tan
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Commission
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Phone: 864-331-7323
FAX: 864-672-5105
sberlin@nuvox.com



Manuel A. Gurdian

(+) Signed Protective Agreement

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Represents NuVox
Represents CompSouth

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)
December 1, 2006

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

COMES NOW BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), and files, pursuant to Rule 25-22.006(6)(c), Florida Administrative Code, a Motion for Temporary Protective Order ("Motion") in connection with its revised responses to Florida's Citizens ("Citizens" or "OPC") First Set of Interrogatories, Item No. 4 and First Request for Production of Documents, Item No. 2 (collectively referred to as the "Discovery"), dated September 11, 2006.

On December 1, 2006, BellSouth filed its Revised Response to Citizens's First Set of Interrogatories, Item No. 4, and First Request for Production of Documents, Item No. 2, 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 responses to Citizens' Interrogatory, No. 4, and Request for Production of Documents, No. 2, is 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 tropical system related costs and expenses BellSouth experienced from 1994 to 2005. Once OPC notifies BellSouth

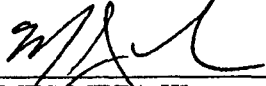
that any of the proprietary documents are to be used in a proceeding for the Commission, BellSouth will file a detailed Motion for Protective Order specifically addressing each of the documents identified in accordance with Rule 25-22.006, Florida Administrative Code.

Counsel for BellSouth contacted counsel for OPC on December 1, 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.

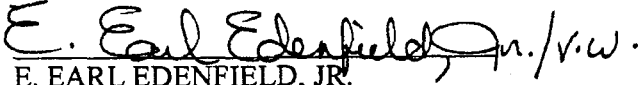
WHEREFORE, BellSouth respectfully requests the Commission to grant its Motion for Temporary Protective Order in regard to its Revised Response to Citizens's First Set of Interrogatories, No. 4, and First Request for Production of Documents, No. 2, dated September 11, 2006.

Respectfully submitted this 1st day of December, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.



JAMES MEZA III
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c/o Nancy H. Sims
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