

ORIGINAL

Timolyn Henry

From: Woods, Vickie [Vickie.Woods2@bellsouth.com]	CMP <u> 1 </u>
Sent: Friday, December 01, 2006 2:01 PM	COM <u> </u>
To: Filings@psc.state.fl.us	CTR <u> </u>
Subject: 060598-TL BellSouth's Motion for Temporary Protective Order for its Late-Filed Deposition Exhibit Nos. 3, 4, 6, and 8 for Kathy K. Blake	ECR <u> </u>
Importance: High	GCL <u> 1 </u>
Attachments: MFTPO_LF.pdf	OPC <u> </u>

Vickie Woods
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RCA
SCR
SGA
SEC 1
OTH Kimf
Lockard

1. Docket No. 060598-TL: In Re: Petition to recover 2005 tropical system related costs and expenses by BellSouth Telecommunications, Inc.

2. BellSouth Telecommunications, Inc.
on behalf of Manuel A. Gurdian

3. 4 pages total (including letter, pleading and certificate of service)

4. BellSouth Telecommunications, Inc.'s Motion for Temporary Protective Order (for its' Late-Filed Deposition Exhibit Nos. 3, 4, 6 and 8 for Kathy K. Blake)

.pdf version attached

<<MFTPO_LF.pdf>>

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(CONF DN 11072-06)

DOCUMENT NUMBER-DATE

11066 DEC-18

FPSC-COMMISSION CLERK

12/1/2006

ORIGINAL

Legal Department

Manuel A. Gurdian
Attorney

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

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

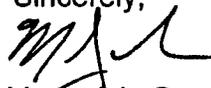
Re: **Docket No. 060598-TL: Petition by BellSouth
Telecommunications, Inc., pursuant to Florida Statutes
§364.051(4), to Recover 2005 Tropical System Related Costs
and Expenses**

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Motion for Temporary Protective Order for its Late-Filed Deposition Exhibits (Nos. 3, 4, 6 and 8) for Kathy K. Blake, 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

11066 DEC-1 06

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
Staff Counsels
Florida Public Service
Commission
Division of Legal Services
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Tallahassee, FL 32399-0850
pwiggins@psc.state.fl.us
ateitzma@psc.state.fl.us
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NuVox Communications, Inc.
Susan J. Berlin (+)
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Greenville, SC 29601
Phone: 864-331-7323
FAX: 864-672-5105
sberlin@nuvox.com



Manuel A. Gurdian

(+) Signed Protective Agreement

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Deputy Public Counsel
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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
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 Late Filed Deposition Exhibits Nos. 1-8 of Kathy K. Blake.

On December 1, 2006, BellSouth filed the Late Filed Deposition Exhibits Nos. 1-8 of Kathy K. Blake, 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 Late Filed Exhibits 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 BellSouth's in service quantities and revenues broken down by types of service and utilization of retail Hicap Systems broken down to wire center levels. 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

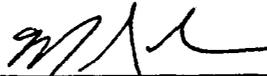
addressing each of the documents identified in accordance with Rule 25-22.006, Florida Administrative Code.

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.

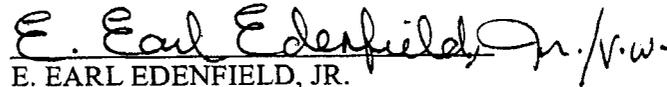
WHEREFORE, BellSouth respectfully requests the Commission to grant its Motion for Temporary Protective Order in regard to the Late Filed Deposition Exhibits 1-8 of Kathy K. Blake.

Respectfully submitted this 1st day of December, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.



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