

12

Harris R. Anthony  
General Attorney-Florida

Southern Bell Telephone  
and Telegraph Company  
Legal Department  
c/o Marshall Criser  
Suite 400  
150 South Monroe Street  
Tallahassee, Florida 32301  
Phone (305) 530-5555

June 8, 1991

**ORIGINAL  
FILE COPY**

Mr. Steve C. Tribble  
Director, Division of Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32301

Re: Public Counsel's Third Set of Interrogatories  
Docket No. 910163 - Repair Investigation

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of  
ACK ✓ Southern Bell Telephone and Telegraph Company's Motion for  
AFA / Temporary Protective Order for Confidential Treatment of  
APP \_\_\_\_\_ Information for Certain Responses to the Public Counsel's Third  
CAF \_\_\_\_\_ Set of Interrogatories, which we ask that you file in the  
captioned docket.

CMR \_\_\_\_\_ A copy of this letter is enclosed. Please mark it to  
CTR \_\_\_\_\_ indicate that the original was filed and return the copy to me.  
EAG \_\_\_\_\_ copies have been served to the parties shown on the attached  
Certificate of Service.

LEG 1 w/m  
LIN 6  
OPC \_\_\_\_\_  
RCH \_\_\_\_\_  
SEC 1 Enclosures  
WAS \_\_\_\_\_ cc: All Parties of Record  
OTH leg A. M. Lombardo  
R. Douglas Lackey

Sincerely yours,  
*Harris R. Anthony*  
Harris R. Anthony  
(22)

RECEIVED & FILED  
113  
FPC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

06867 JUL -8 1991

REC-RECORDS/REPORTING

CERTIFICATE OF SERVICE  
Docket No. 910163-TL

I HEREBY CERTIFY that a copy of the foregoing has been  
furnished by United States Mail this 8th day of July, 1991,  
to:

Charles J. Beck  
Assistant Public Counsel  
111 W. Madison Street  
Room 812  
Tallahassee, Florida 32399-1400

Robert Vandiver  
Division of Legal Services  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32399-0863

Tracy Hatch  
Division of Legal Services  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32399-0863

  
\_\_\_\_\_

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the Integrity of Southern Bell's Repair Service Activities and Reports )  
 )  
 )  
 )  
 )  
 )  
 )  
 )  
 )  
 )

Docket No. 910163-TL  
Filed: June 8, 1991

**SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
MOTION FOR TEMPORARY PROTECTIVE ORDER FOR CONFIDENTIAL  
TREATMENT OF INFORMATION FOR CERTAIN RESPONSES TO  
PUBLIC COUNSEL'S THIRD SET OF INTERROGATORIES**

COMES NOW Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, and files its Motion for Temporary Protective Order for Confidential Treatment of Information for Certain Responses to the Office of Public Counsel's ("Public Counsel") Third Set of Interrogatories.

1. On June 6, 1991, Public Counsel served its Third Set of Interrogatories to Southern Bell, in which it requested certain information that is confidential business information. The proprietary information consists of employee social security numbers which are confidential under Section 364.183, Florida Statutes, and customer specific information which is confidential under Section 119.07(w), Florida Statutes. Southern Bell's responses to Public Counsel's interrogatories, which are being served on Public Counsel, include this proprietary confidential business information.

2. In accord with Rule 25-22.006(5)(c), Florida Administrative Code, Southern Bell is requesting a temporary protective order exempting the information from Section 199.07(1), Florida Statutes. If Public Counsel decides to use

DOCUMENT NUMBER-DATE

06867 JUL -8 1991

FSD-RECORDS/REPORTING


the information in a proceeding before the Commission, then Southern Bell, in accord with the Rule, will file a specific request for a protective order as set forth in Rule 25-22.006, Florida Administrative Code. Furthermore, in accord with Section 364.183(2), Florida Statutes, the interrogatory responses being provided to Public Counsel shall be treated as confidential pending a formal ruling on such request or until Public Counsel returns the records to Southern Bell.

3. The information for which confidential treatment is requested is intended to be and is treated by Southern Bell as confidential and has not been disclosed.

WHEREFORE, Southern Bell requests that the Commission grant its Motion for Temporary Protective Order for Confidential Treatment.

Respectfully submitted,

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY

  
HARRIS R. ANTHONY (28)  
c/o Marshall M. Criser, III  
150 So. Monroe St., Suite 400  
Tallahassee, Florida 32301  
(305) 530-5555

---

R. DOUGLAS LACKEY  
Suite 4300  
675 W. Peachtree Street, NE  
Atlanta, GA 30375  
(404) 529-3862