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FILE

September 3, 1993

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

RE: Docket No. [REDACTED]

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Motion for a Temporary Protective Order for Certain Responses to Public Counsel's Thirty-Seventh Set of Interrogatories. Please file this document in the above-captioned docket.

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

Sincerely,

*Nancy B. White*  
Nancy B. White (e)

Enclosures

cc: All Parties of Record  
A. M. Lombardo  
H. R. Anthony  
R. D. Lackey

RECEIVED  
[Signature]

DOCUMENT NUMBER-DATE

09565 SEP-3 93

RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

FILE

In re: Comprehensive Review of )  
the Revenue Requirements and Rate ) Docket No. 920260-TL  
Stabilization Plan of Southern )  
Bell Telephone and Telegraph ) Filed: September 3, 1993  
Company )  
\_\_\_\_\_ )

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
MOTION FOR A TEMPORARY PROTECTIVE ORDER  
FOR CERTAIN RESPONSES TO PUBLIC COUNSEL'S  
THIRTY-SEVENTH SET OF INTERROGATORIES

COMES NOW, BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), and files pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, its Motion for Temporary Protective Order.

1. On August 4, 1993, the Office of Public Counsel ("Public Counsel") served upon Southern Bell its Thirty-Seventh Set of Interrogatories in the above captioned matter. Within that set of Interrogatories an item which requests, among other things, charges made by affiliate, non-regulated companies to another nonregulated affiliate. Southern Bell considers this information to be proprietary and confidential business information pursuant to Section 364.183(3), (3)(d) and (3)(e), Florida Statutes.

2. Pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, Southern Bell moves the Prehearing Officer to issue a Temporary Protective Order exempting the portions of the Company's responses to Interrogatory Item No. 951 from § 119.07(1), Florida Statutes.

3. If Public Counsel subsequently notifies Southern Bell that this proprietary information is to be used in a proceeding before this Commission, Southern Bell will, in accordance with Rule 25-22.006(5)(c), Florida Administrative Code, file a detailed

DOCUMENT NUMBER-DATE

09565 SEP-38

PPSC-RECORDS/REPORTING

Motion for Protective Order specifically addressing the information identified.

4. With respect to Southern Bell's response to the above enumerated items, the information requested contains proprietary confidential business information including, but not limited to, cost information relating to non-regulated lines of business within Southern Bell. Such information is expressly exempt from the public inspection and examination provisions of § 119.07(1), Florida Statutes pursuant to § 364.183(3), (3)(d) and 3(e), Florida Statutes.

5. All of the information for which Southern Bell requests confidential treatment is intended to be treated as confidential, has been treated as confidential and has not been disclosed to any third party except pursuant to statutory provisions or private agreement that provides that the information will not be released to the public.

WHEREFORE, Southern Bell respectfully requests that the Prehearing Officer issue a Temporary Protective Order exempting portions of Southern Bell's responses to Public Counsel's Thirty-Seventh Set of Interrogatories from § 119.07(1), Florida Statutes, in accordance with Rule 25-22.006, Florida Administrative Code.

Respectfully submitted this 3rd day of September, 1993.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY

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**CERTIFICATE OF SERVICE**

**Docket No. 920260-TL**

**Docket No. 900960-TL**

**Docket No. 910163-TL**

**Docket No. 910727-TL**

I HEREBY CERTIFY that a copy of the foregoing has been  
furnished by United States Mail this 3rd day of September, 1993  
to:

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