Legal Department

NANCY B. WHITE General Attorney

Southern Bell Telephone and Telegraph Company 150 South Monroe Street Suite 400 Tallahassee, Florida 32301 (404) 529-5387



## July 7, 1995

Mrs. Blanca S. Bayo Director, Division of Records and Reporting Florida Public Service Commission 101 East Gaines Street Tallahassee, Florida 32301

RE: Docket No. 920260-TL

Dear Mrs. Bayo:

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Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Motion for a Temporary Protective Order. Please file these documents in the 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,	
		Manay	B. Whit
		Nancy B.	White
clo	osures		
:	All Parties of Reco A. M. Lombardo R. G. Beatty R. D. Lackey	rd	

DOCUMENT HUMBER-DATE

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FPSC-RECORDS/REPORTING

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of the Revenue Requirements and Rate Stabilization Plan of Southern Bell Telephone and Telegraph Company Docket No. 920260-TL Filed: July 7, 1995

## SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S MOTION FOR A TEMPORARY PROTECTIVE ORDER

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 in connection with its Responses to Office of Public Counsel's ("Public Counsel") Eighth Set of Post-Settlement Interrogatories dated June 7, 1995.

On June 7, 1995, Southern Bell filed its Response to Public Counsel's Eighth Set of Post-Settlement Interrogatories, portions of which are deemed to be confidential and proprietary by Southern Bell. Some of the documents that will be delivered to and reviewed by Public Counsel in connection with these responses to these interrogatories contain 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, Southern Bell moves that the Prehearing Officer issue a Temporary Protective Order exempting these documents from § 119.07(1), Florida Statutes. The proprietary information in guestion includes, but is not limited to, information concerning settlements of lawsuits and other claims, as well as information concerning unregulated

> DOCUMENT NUMBER-DATE 06445 JUL-78 FPSC-RECORDS/REPORTING

operations. Once Public Counsel notifies Southern Bell that any of the proprietary documents are to be used in a proceeding for the Commission, Southern Bell 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.

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WHEREFORE, Southern Bell respectfully requests the Commission to grant its Motion for Temporary Protective Order in regard to its Responses to Public Counsel's Eighth Set of Post-Settlement Interrogatories dated June 7, 1995.

Respectfully submitted this 7th day of July, 1995.

## ATTORNEYS FOR 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 7th day of July, 1995 to:

Robin Norton Division of Communications Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

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Mary B. White