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PLEASE REPLY TO:  
TALLAHASSEE

February 12, 1998

**VIA HAND DELIVERY**

Ms. Blanca Bayó  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

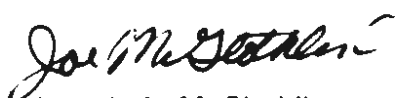
Re: Docket No. 971487-TI - In re: Initiation of show cause proceeding  
against LCI International Telecom Corp for violation of Rule 25-4.118,  
F.A.C., Interexchange Carrier Selection

Dear Ms. Bayó:

Enclosed are the original and 15 copies of LCI's Notice of Intent to Request  
Specified Confidential Classification and Request for Temporary Protective Order for  
Documents Identified in Response to Motion to Compel to be filed in the above  
docket.

ACK \_\_\_\_\_ I have enclosed an extra copy of the above document for you to stamp and  
AFA \_\_\_\_\_ return to me. Please contact me if you have any questions. Thank you for your  
APP \_\_\_\_\_ assistance.

CAF 1  
CMU \_\_\_\_\_  
CTR \_\_\_\_\_  
EAG \_\_\_\_\_  
LEG R  
LIN \_\_\_\_\_  
OPC Enclosures  
RCR \_\_\_\_\_  
SE 1

Sincerely,  
  
Joseph A. McGlothlin

WAP \_\_\_\_\_  
OTH Cy Statelida

DOCUMENT NUMBER-DATE  
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FPSC-RECORDS/REPORTING

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Initiation of show cause	)	
proceeding against LCI International	)	Docket No. 971487-TI
Telecom Corp for violation of	)	
Rule 25-4.118, F.A.C., Interexchange	)	
Carrier Selection.	)	Filed: February 12, 1998
_____)		

**LCI'S NOTICE OF INTENT TO REQUEST SPECIFIED CONFIDENTIAL  
CLASSIFICATION AND REQUEST FOR TEMPORARY PROTECTIVE  
ORDER FOR DOCUMENTS IDENTIFIED IN RESPONSE TO MOTION TO COMPEL**

Pursuant to Rule 25-22.006(6)(c), Florida Administrative Code, and Section 364.183, Florida Statutes, LCI International Telecom Corp (LCI) files this Notice of Intent to Request Specified Confidential Classification and Request for Temporary Protective Order for certain documents that LCI identified in its Response to the First Motion to Compel. In support, LCI states:

1. On December 9, 1997, the Office of the Public Counsel (OPC) and the Attorney General of the State of Florida (AG) jointly served their First Request for Production of Documents on LCI.

2. On January 8, 1998, LCI filed its response to the First Request for Production of Documents. In its response, LCI agreed to provide certain documents, and objected to portions of the request.

3. On January 20, 1998, OPC and AG filed their First Motion to Compel relating to LCI's objections.

4. On February 4, 1998, LCI responded to the Motion to Compel. In its response, LCI continued to object to certain portions of the document request. However, with respect to a certain "tracking report" requested in Item No. 8, and

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FPSC-RECORDS/REPORTING


certain documents relating to Michael Chambers identified in Item No. 9, LCI indicated that it would withdraw its objections and allow OPC and AG to inspect such documents, subject to appropriate conditions of confidentiality.

5. The documents and information requested by OPC and AG that LCI agreed to provide for inspection in LCI's response to the Motion to Compel are subject to privilege, or are confidential and proprietary under Section 364.183, Florida Statutes; Rule 25-22.006, Florida Administrative Code; and rules governing discovery. Accordingly, LCI is filing this Notice of Intent to Request Confidential Classification. The proprietary information includes, but is not limited to, trade secrets and information which, if disclosed, would harm LCI's business operations or its competitive posture and/or would harm ratepayers. (To the extent certain documents also include customer-specific information that may fall under the purview of Section 364.24, Florida Statutes, that information also is confidential. OPC and AG have served a subpoena that encompasses those documents.) LCI also moves for a Temporary Protective Order exempting these documents from Section 199.07, Florida Statutes.

6. If Public Counsel or AG informs LCI that either intends to use any of the confidential and/or proprietary documents identified herein in a proceeding before the Commission, LCI will file a Motion for Permanent Protective Order in which it will address each of the documents for which protection is sought with specificity in accordance with Rule 25-22.006, Florida Administrative Code.

WHEREFORE, LCI requests the Commission to enter a Temporary Protective Order exempting the following documents encompassed by OPC's First Set of Requests for Production of Documents and identified in LCI's response to the First Motion to Compel from Section 119.07, Florida Statutes.

Documents bearing Bates Stamp Nos. 000079 - 000126.

  
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Telephone: (850) 222-2525

Attorney for LCI International  
Telecom Corp

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of LCI's foregoing Notice of Intent to Request Specified Confidential Classification and Request for Temporary Protective Order for Documents Identified in Response to Motion to Compel has been furnished by Hand Delivery(\*) or United States Mail this 12th day of February, 1998:

John Bowman\*  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Room 390-M  
Tallahassee, Florida 32399-0850

Michael A. Gross  
Assistant Attorney General  
Department of Legal Affairs  
The Capitol, PL-01  
Tallahassee, FL 32399-1050

Charles J. Beck\*  
Deputy Public Counsel  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, Florida 32399-1400

  
Joseph A. McGoethlin