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SIDNEY J. WHITE, JR. General Attorney

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October 12, 1992

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

RE: Docket No. 920260-TL

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 its Response to Public Counsel's Fourteenth Set of Interrogatories, Item No. 349 which we ask that you file 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, dney White Jr.

Enclosures

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

DOCUMENT NUMBER-DATE 11953 OCT 12 DEE FPSC-RECORDS/REPORTING I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this 12th day of October, 1992 to:

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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 (Formerly FPSC Docket Number 880069-TL)

Docket No. 920260-TL

Filed: October 12, 1992

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S MOTION FOR A TEMPORARY PROTECTIVE ORDER FOR ITS RESPONSE TO PUBLIC COUNSEL'S FOURTEENTH SET OF INTERROGATORIES, ITEM NO. 349

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 September 11, 1992, the Office of Public Counsel ("Public Counsel") served upon Southern Bell its Fourteenth Set of Interrogatories. Within that set of Interrogatories is Item No. 349 which requests information regarding projected provision of competitive services and projected revenues for such planned services. Southern Bell considers this information to be proprietary confidential business information pursuant to § 364.183, 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 Company's response to the above-referenced Interrogatory 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 Motion for Protective Order specifically addressing the information identified.

4. With respect to Southern Bell's response to Item No. 349, the information requested pertaining to projected provision of competitive services and projected revenues for such planned services constitutes proprietary confidential business information. The response contains listings of services Southern Bell plans to offer in the future and the Company's estimation of the future demand for such services as evidenced by projected revenues by service category. Such information is specifically considered to be proprietary confidential business information under § 364.183(3)(e), Florida Statutes, inasmuch as the information relates to competitive interests, the disclosure of which would impair Southern Bell's competitive business.

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 Southern Bell's response to Item No. 349 of Public Counsel's Fourteenth Set of Interrogatories from § 119.97(1), Florida

- 2 -

Statutes, in accordance with Rule 25-22.006, Florida

Administrative Code.

Respectfully submitted this 12th day of October, 1992.

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

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