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February 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. 920260-TL - 900960-TL - 910163-TL - 910727-TL

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Notice of Intent to Seek Confidential Classification and to File a Motion for Permanent Protective Order, which we ask that you file 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 to the parties shown on the attached Certificate of Service.

Sincerely yours,

J. Phillip Carver
J. Phillip Carver *JPC*

Enclosures

cc: All Parties of Record
A. M. Lombardo
Harris R. Anthony
R. Douglas Lackey

DOCUMENT NUMBER-DATE
01536 FEB-88
FPSC-RECORDS/REPORTING

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 *5th* day of *February*, 1993
to:

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J.P.C.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of) Docket No. 920260-TL
the Revenue Requirements and Rate)
Stabilization Plan of Southern)
Bell Telephone & Telegraph Company)

In re: Investigation into Southern) Docket No. 900960-TL
Bell Telephone and Telegraph)
Company's Non-Contact Sales)
Practices)

In re: Petition on behalf of) Docket No. 910163-TL
Citizens of the State of Florida)
to initiate investigation into)
integrity of Southern Bell)
Telephone and Telegraph Company's)
repair service activities and)
reports.)

In re: Investigation into) Docket No. 910727-TL
Southern Bell Telephone and)
Telegraph Company's Compliance)
with Rule 25-4.110(2) (Rebates))
Filed: Feb. 8, 1993)

**SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
NOTICE OF INTENT TO SEEK CONFIDENTIAL CLASSIFICATION
AND TO FILE A MOTION FOR PERMANENT PROTECTIVE ORDER**

COMES NOW BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), pursuant to Rule 25-22.006, Florida Administrative Code, and hereby files its Notice of Intent to Seek Confidential Classification and to file a Motion for Permanent Protective Order regarding certain portions of the panel deposition of Dan King and Etta Martin, taken January 12, 1993, and of the exhibits thereto, and states as grounds in support thereof the following:

1. On January 12 1993, the Office of Public Counsel ("Public Counsel") conducted a deposition of a panel composed of Southern Bell employees, Dan King and Etta Martin. At that time,

Southern Bell and Public Counsel entered into an agreement for the handling of confidential material. Specifically, the agreement was that Southern Bell would file within ten days of its receipt of the transcript of the deposition, a notice that it intended to seek confidential classification and move for a permanent protective order as to any portions of the deposition and exhibits that Southern Bell considers to be confidential. Under the Agreement, Southern Bell would file the Request for Confidential Classification and Motion for Permanent Protective Order within 20 days after filing the Notice of Intent.

2. Southern Bell received the transcript of the above-referenced deposition less than 10 days ago. Accordingly, Southern Bell hereby gives notice of its intent to seek confidential classification as to Exhibit No. 9 to the deposition and the portions of the deposition that contain substantive references to that exhibit.

3. Exhibit No. 9 is a document that describes a computer program owned by American Telephone & Telegraph ("AT&T") called LMOSJOB2. This computer program (and the description of it contained in Exhibit No. 9) constitutes proprietary confidential business information that is owned by AT&T. This information was provided to Southern Bell by AT&T pursuant to an agreement that Southern Bell would treat this information confidentially. Southern Bell has treated this information confidentially, and has not disclosed the information publicly.

4. The public release of this information would cause competitive harm to AT&T. The public release of this information would also harm Southern Bell because, if Southern Bell is unable to obtain confidentiality for this type of information, then it will become extremely difficult for Southern Bell to secure the use of this type of information in the future. This information constitutes proprietary business information that is entitled to exemption from public disclosure pursuant to the terms of Florida Statutes § 364.183.

WHEREFORE, Southern Bell respectfully submits its Notice of Intent to seek Confidential Classification and to File a Motion for Permanent Protective Order.

Respectfully submitted,

ATTORNEYS FOR SOUTHERN BELL
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