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CAULE GRANDLAW

PLEASE REPLY TO
TALLAHASSEE

TALLAHASSEE OFFICE
117 N. GADSDEN
TALLAHASSEE, FLORIDA 32301
TELEPHONE (904) 222-2525
FAX (904) 222-5005

January 14, 1998

VIA HAND DELIVERY

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

Re: Docket No. ~~98-1007~~ - In re: Complaint of Robert A. Butterworth, Attorney General, and the Citizens of the State of Florida, by and through Jack Shreve, Public Counsel, against LCI International for slamming David Howe in violation of Rule 25-4.118, F.A.C.

Dear Ms. Bayó:

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

ACK _____ I have enclosed an extra copy of the above documents for you to stamp and
AFA _____ return to me. Please contact me if you have any questions. Thank you for your
APP 1 _____ assistance.

CAF _____
CMU _____
CTR _____
EAG _____
LET 1 _____
JAM/jg

Sincerely,

Joe McGlothlin
Joseph A. McGlothlin

ENC _____ Enclosures
FBI _____
SEC 1 _____
WAS _____
GTH Noted by

RECEIVED & FILED
Lem
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

~~98-1007~~ 148
FPSC-RECORDS/REPORTING

such a requirement. AG has since served a subpoena that encompasses those documents. Such information is also entitled to confidential classification and protective order. The proprietary information therefore 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.

On January 9, 1998, LCI filed a Notice of Intent to Request Specified Confidential Classification and Request for Temporary Protective Order relative to documents stamped with Nos. 000001-000046, inclusive; 000054; 000057-000058; and 000066-000073. The purpose of this Supplemental Notice is to invoke the provisions regarding confidentiality for the documents containing information within the purview of Section 364.24, Florida Statutes, which have since been subpoenaed. LCI also moves for a Temporary Protective Order exempting these additional documents from Section 119.07, Florida Statutes.

3. If OPC and AG inform LCI that OPC and AG intend to use any of the confidential, proprietary, and/or statutorily protected documents 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 classifying the following additional documents encompassed by the First Set of Requests for Production of Documents served by OPC and AG as confidential and exempting them from Section 119.07, Florida Statutes.

Documents bearing Bates Stamp Nos. 000074-000078, inclusive.



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Attorney for LCI International
Telecom Corporation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of LCI's foregoing Supplemental Notice of Intent to Request Specified Confidential Classification and Request for Temporary Protective Order has been furnished by United States mail or hand delivery(*) this 14th day of January, 1998.

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

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