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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 20, 1998
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LCI'S NOTICE OF INTENT TO REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATION AND REQUEST FOR TEMPORARY PROTECTIVE ORDER FOR DOCUMENT PROVIDED IN RESPONSE TO SECOND REQUESTS TO PRODUCE

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 a certain document that LCI is providing to the Attorney General (AG) and the Office of Public Counsel (OPC) in response to their Second Set of Requests for Production of Documents. In support, LCI states:

On January 21, 1998, the Office of the Public Counsel and the Attorney
General of the State of Florida jointly served their Second Request for Production of
Documents on LCI.

On February 20, 1998, LCI filed its response to the Second Request for

Production of Documents.

APA

3. In its response, LCI agreed to provide a document in response to Item No.

CAF

14. The document, a certain "tracking report," will be provided, subject to appropriate

enditions of confidentiality.

4. The document requested by CPC and AG that LCI agreed to provide for inspection in LCI's response to the Second Set of Requests for Production of Documents is subject to privilege, or is confidential and proprietary under Section

Documents is subject to privilege, or is confidential and proprietary under Section

Documents is Subject to Privilege, or is Confidential and Documents and Documents Do

2.

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. LCI also moves for a Temporary Protective Order exempting this document from Section 119.07, Florida Statutes.

5. If Public Counsel or AG informs LCI that either intends to use the confidential and/or proprietary document, or any portion thereof, identified herein in a proceeding before the Commission, LCI will file a Motion for Permanent Protective Order in which it will address the basis for this request 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 document encompassed by OPC's Second Set of Requests for Production of Documents from Section 119.07, Florida Statutes.

Document bearing Bates Stamp Nos. 000127 - 000135.

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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 Second Set of Requests for Production of Documents has been furnished by Hand Delivery(*) or United States Mail this 20th 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

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

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

eph A. McGlothlin