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General Counsel - FL

BellSouth Telecommunications, Inc.  
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(305) 347-5558

October 5, 2006

Mrs. Blanca S. Bayó  
Director, Division of the Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

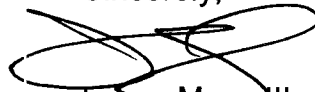
**Re: Docket No. 060598-TL: Petition by BellSouth Telecommunications, Inc., pursuant to Florida Statutes §364.051(4), to Recover 2005 Tropical System Related Costs and Expenses**

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Motion for Temporary Protective Order, which we ask that you file in the captioned docket.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,



James Meza III

cc: Jerry D. Hendrix  
E. Earl Edenfield, Jr.

**CERTIFICATE OF SERVICE**  
**Docket No. 060598-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via  
Electronic Mail and Overnight Mail this 5th day of October, 2006 to the following:

Patrick Wiggins  
Adam Teitzman  
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Commission  
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Represents NuVox  
Represents CompSouth

  
James Meza III

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Petition by BellSouth Telecommunications, Inc., ) Docket No. 060598-TL  
pursuant to Florida Statutes § 364.051(4) to Recover )  
2005 Tropical System Related Costs and Expenses )  
\_\_\_\_\_ ) October 5, 2006

**BELLSOUTH TELECOMMUNICATIONS, INC.’S MOTION FOR A  
TEMPORARY PROTECTIVE ORDER**

COMES NOW BellSouth Telecommunications, Inc. (“BellSouth” or “Company”), and files, pursuant to Rule 25-22.006(6)(c), Florida Administrative Code, a Motion for Temporary Protective Order (“Motion”) in connection with its responses to Florida’s Citizens (Citizens or OPC) First Set of Interrogatories (Nos. 1-4) and First Request for Production of Documents (Nos. 1-10) (collectively referred to as the “Discovery”), dated September 11, 2006.

On October 5, 2006, BellSouth filed its Response and Objections to Citizens’s First Request for Production of Documents, portions of which are deemed to be confidential and proprietary by BellSouth. Some of the information that will be conveyed to and reviewed by Citizens in connection with the responses to the Production of Documents contains proprietary, confidential business information which should not be publicly disclosed. Thus, pursuant to the Commission’s Rule on confidentiality, Rule 25-22.006(5)(c), Florida Administrative Code, BellSouth moves the Prehearing Officer to issue a Temporary Protective Order exempting these documents from § 119.07(1), Florida Statutes. The proprietary information in question includes, but is not limited to, confidential business and financial information related to tropical system related costs and expenses BellSouth experienced in 2005. Once OPC notifies BellSouth that any of the proprietary documents are to be used in a proceeding for the Commission, BellSouth


will file a detailed Motion for Protective Order specifically addressing each of the documents identified in accordance with Rule 25-22.006, Florida Administrative Code.

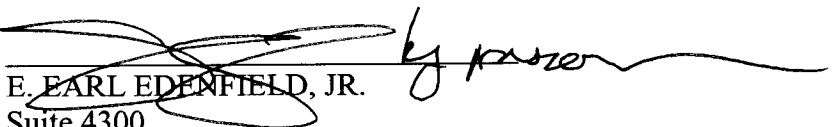
Counsel for BellSouth contacted counsel for OPC on October 4, 2006 and advises that OPC does not object to the Motion but that OPC reserves the right to challenge the confidential status of any particular document.

WHEREFORE, BellSouth respectfully requests the Commission to grant its Motion for Temporary Protective Order in regard to its Response to Citizens's First Request for Production of Documents dated September 11, 2006.

Respectfully submitted this 5th day of October, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
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