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May 2, 1989

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

Re: Request for Specified Confidential Classification
Docket No. 870790-TL - Gilchrist County EAS

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Request for Specified Confidential Classification, which we ask that you file in the captioned docket.

Southern Bell also requests that the traffic studies, filed on March 29, 1989 in the captioned docket, be substituted with the enclosed Request for Specified Confidential Classification.

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,

E. Barlow Keener

Enclosures

cc: All Parties of Record
A. M. Lombardo
Joaquin R. Carbonell
R. Douglas Lackey

(copy)
attach. A
DOCUMENT NUMBER-DATE

04384 MAY-2 1989

FPSC-RECORDS/REPORTING

ATTACH. B
DOCUMENT NUMBER-DATE

04385 MAY-2 1989
A BELL SOUTH Company

FPSC-RECORDS/REPORTING

Request
DOCUMENT NUMBER-DATE

04383 MAY-2 1989

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 870790-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this *2nd* day of *March*, 1989 to:

Debra Schiro
Division of Legal Services
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

Richard Brashnear
ALLTEL Florida, Inc.
Post Office Box 550
Live Oak, Florida 32060

Gilchrist County
Board of County Commissioners
Post Office Box 37
Trenton, FL 32693

Michael W. Tye
Senior Attorney
AT&T Communications of the So. States, Inc.
315 So. Calhoun Street
Suite 505
Tallahassee, Florida 32301

Florida Interexchange Carriers
Association
c/o Joseph Gillan
Post Office Box 541038
Orlando, Florida 32854-1038

E. Burlaw Keena

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Extended Area Service) Docket No. 870790-TL
Request throughout Gilchrist)

) Filed: May 2, 1989

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION

COMES NOW Southern Bell Telephone and Telegraph Company (Southern Bell or Company), pursuant to Rule 25-22.006, Florida Administrative Code, and files its Request for Specified Confidential Classification in the above-referenced docket and as support therefore shows:

1. On January 17, 1989, the Commission issued Order No. 20607, in the above-referenced docket, which required Southern Bell Telephone and Telegraph Company (Southern Bell or Company) to file traffic studies on routes that were interLATA in nature.

2. On March 29, 1989, Southern Bell filed with the Commission certain traffic studies in response to that order. Southern Bell now requests that the traffic study appended hereto in a sealed envelope as Attachment "A", be substituted in lieu thereof. The confidential proprietary information contained in Attachment "A" has been highlighted so that it can be easily identified.

3. For the convenience of the parties of record, Southern Bell has removed the confidential information from the traffic study and is providing the non-confidential version of the traffic study to all parties of record as Attachment "B".

4. Commission Rule 25-22.006(4)(a) provides that a utility may satisfy its burden of providing that information is specified confidential material by demonstrating how the information falls under one or more of the available statutory examples. In the alternative, if no statutory example is available, the utility may satisfy its burden by including a justifying statement indicating what penalties or ill effects on Southern Bell or its ratepayers will result from the disclosure of the information to the public. A detailed explanation of the reasons the highlighted information is proprietary is set forth below.

5. The traffic studies relative to the interLATA routes at issue in this proceeding basically provide a blueprint of the toll usage over these various routes. The information contained in these traffic studies was obtained from AT&T with the express understanding that such information was proprietary confidential business information and as such should be protected from public disclosure in these proceedings. The same information is normally made available to Southern Bell by AT&T on a confidential basis in

order that Southern Bell may accurately plan its network deployment based on actual and perceived traffic demand over the respective toll routes.

6. Although the traffic information is clearly necessary for a full examination of the merits of the extended area service request in this case, such information also contains data that indicates which routes at issue in this case contain the most concentrated traffic. The disclosure of such traffic patterns to the public would make available to AT&T's competitors highly valuable competitive information which such competitors could use to target the most lucrative routes. If the Commission were to publicly release the interLATA traffic data Southern Bell has obtained from AT&T, not only would such public release competitively harm AT&T directly, but it also would almost certainly harm Southern Bell because AT&T could hereafter withhold such information from Southern Bell due to the threat of public release of such information. Consequently, without accurate traffic data from the interexchange carriers, Southern Bell would be severely hampered in its efforts to plan its needed network deployment, particularly with regard to situations where expansion may be needed.

7. Commission Rule 25-22.006(4)(a), Florida Administrative Code, provides that a company may justify that information should be classified as specified confidential business information by

showing what ill effects would be felt by the Company if such information were disclosed. Southern Bell has shown herein that if the Commission were to make the interLATA traffic data obtained from AT&T publicly available, Southern Bell would be harmed hereafter due to AT&T's unwillingness to disclose such information to Southern Bell in the future. If Southern Bell is not able to obtain accurate traffic data from the interexchange carriers, its goal of efficient and timely deployment of necessary network and other facilities would be severely frustrated.

8. For all the foregoing reasons, Southern Bell respectfully urges the Commission to classify the above-described and discussed interLATA traffic data as specified confidential business information pursuant to Rule 25-22.006, Florida Administrative Code, and as such exempt from Section 119.07, Florida Statutes. Due to the uncertainties involved in the viability of any particular toll route at issue in the areas covered by this request, no specific date can be determined when such information would become non-proprietary. Consequently, Southern Bell would urge that the Commission recognize that the information will remain proprietary confidential business information in perpetuity.

WHEREFORE, Southern Bell Telephone and Telegraph Company
moves the Commission to enter his Order declaring this information
to fall within the specified confidential classification.

Respectfully submitted,

SOUTHERN BELL TELEPHONE AND
TELEGRAPH COMPANY

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