

E. Barlow Keener
Attorney

Southern Bell

c/o Marshall M. Criser
Suite 400
150 So. Monroe Street
Tallahassee, FL 32301
Phone (305) 530-5558

November 20, 1990

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

Re: Docket No. 891194-TL - Caller ID

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Motion for Temporary Protective Order for Confidential Treatment of Information, 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,

E. Barlow Keener
E. Barlow Keener

Enclosures

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

RECEIVED & FILED



RECORDS

A BELLSOUTH Company

DOCUMENT NUMBER-DATE

10404 NOV 20 1990

REC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 89-194-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 20th day of Nov.,
1990 to:

Walter D'Haeseleer
Division of Communications
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0866

Angela Greene
Division of Legal Services
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0863

Jack Shreve
Public Counsel
Office of the Public Counsel
111 W. Madison St.
Room 812
Tallahassee, FL 32399-1400

John E. Thrasher, Esq.
Jeffrey L. Cohen, Esq.
Florida Medical Association
Post Office Box 2411
Jacksonville, Florida 32203

Willis Booth, Director
Florida Police Chiefs
Association
Post Office Box 14038
Tallahassee, Florida 32317-4038

Thomas R. Parker, Esq.
STE Florida Incorporated
Post Office Box, 110 MC 7
Tampa, Florida 33601-0110

Michael R. Ramage
Deputy General Counsel
Fla. Dept. of Law Enforcement
Post Office Box 1489
Tallahassee, Florida 32302

Robert A. Butterworth
Attorney General
Dept. of Legal Affairs
The Capitol
Tallahassee, FL 32399-1050

Stephen S. Mathues
Dept. of General Services
Koger Executive Center
2737 Centerview Drive
Knight Bldg., Suite 309
Tallahassee, FL 32399-0950

Pete Antonacci
Statewide Prosecutor
Dept. of Legal Affairs
The Capitol, Plaza 01
Tallahassee, FL 32399-1050

Alan N. Berg
Senior Attorney
United Telephone Co. of Fla.
Post Office Box 5000
Altamonte Spgs, FL 32716-1000

Department of Legal Affairs
Richard E. Doran
Director, Criminal Appeals
The Capitol
Tallahassee, FL 32399-1050

Cheryl Phoenix, Director
Florida Coalition Against
Domestic Violence
Post Office Box 532041
Orlando, FL 32853-2041

E. Carlos Keenan

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed tariff filings) Docket No. 891194-TL
by Southern Bell Telephone and)
Telegraph Company clarifying when) Filed: November 20, 1990
a nonpublished number can be)
disclosed and introducing Caller)
ID to Touchstar Service)
_____)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
MOTION FOR TEMPORARY PROTECTIVE ORDER
FOR CONFIDENTIAL TREATMENT OF INFORMATION

COMES NOW Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, and Section 364.183, Florida Statutes, and files its Motion for Temporary Protective Order for Confidential Treatment of Information.

1. On November 7, 1990, the Florida Public Service Commission Staff ("Staff") served a set of interrogatories on Southern Bell in which the Staff requested in Item No. 14 certain information regarding the vendor costs which are incurred when Southern Bell purchases TouchstarSM services from its vendors. Because the information concerns bids and contractual data, the disclosure of which would impair the efforts of the Company to contract for vendor products on favorable terms, Southern Bell requests that the Commission treat the information provided in the interrogatory as proprietary confidential business information. Section 364.183(3)(d), Florida Statutes, provides that such contractual data shall be treated as confidential. The

DOCUMENT 89-1194-TL

10404 NOV 20 1990

60-RECORDS/REPORTING

amounts which the vendor charges for Touchstar services are located on page 1, lines 17, 22, 24, 29, 30, 31, and 35.

Pursuant to Rule 25-22.006, Florida Administrative Code, appended hereto in a sealed envelope as Attachment "A" is a copy of the information with confidential portions highlighted. Appended hereto as Attachment "B" are two edited copies of the answer to the interrogatory.

2. Furthermore, in accord with Section 364.183(2), Florida Statutes, Southern Bell shall make the information available to the Commission Staff which will treat the information as confidential pending a formal ruling by the Commission of Southern Bell's Motion for Permanent Protective Order.

3. The information for which confidential treatment is requested is intended to be and is treated by Southern Bell as confidential and has not been disclosed.

WHEREFORE, Southern Bell requests that the Commission grant its Motion for Temporary Protective Order for Confidential Treatment

Respectfully submitted,

SOUTHERN BELL TELEPHONE AND
TELEGRAPH COMPANY

Harris R. Anthony
HARRIS R. ANTHONY
General Attorney-Florida
c/o Marshall M. Criser, III
150 So. Monroe Street, Suite 400
Tallahassee, FL 32301
(305) 530-5555

E. Barlow Keener
E. BARLOW KEENER
Attorney
c/o Marshall M. Criser, III
150 So. Monroe Street, Suite 400
Tallahassee, FL 32301
(305) 530-5558

1 REQUEST: Please explain how Southern Bell purchased the TouchStar
2 features from its switch vendors. Please include information on cost,
3 whether the features were sold individually or in a package, and if
4 sold individually, whether the features all came in one software
5 installation with separate right-to-use fees or the software itself
6 was separated.

7
8 RESPONSE: NOTE: The following contains information which is
9 proprietary, as it concerns negotiated contracts between BellSouth and
10 switch vendors. This information cannot be publicly disclosed per
11 agreement with the involved switch vendors. Such disclosure could
12 jeopardize BellSouth's continued ability to negotiate reduced rate
13 purchases with these vendors.

14
15 BellSouth purchases the software required for TouchStar features under
16 contracts with its various switch vendors. The features for all LAESS
17 switches are purchased as a package for a flat fee of _____ per
18 switch. All features are loaded at the same time and include the six
19 currently tariffed features as well as Caller ID. In the 5ESS switch
20 only four features (Call Return, Repeat Dialing, Call Tracing, and
21 Caller ID) are initially available and they are purchased as a
22 package, either at a price of _____ per switch mod or a price of
23 per line (in 100 line increments). These list prices are discounted
24 for BellSouth under existing contracts from _____ depending on
25 various factors as specified in the AT&T/BellSouth contracts. The DMS
26 switches initially have available the same four features as the 5ESS,
27 which are purchased as individual feature packages under NTL/BellSouth
28 contracts. The prices for the features are: Call Return/Repeat
29 Dialing (purchased jointly)- _____; Call Tracing- _____; Caller ID-
30 _____. These list prices are discounted to BellSouth by
31 initially, with another _____ discount off the discounted price
32 depending various factors as specified in the NTL/BellSouth contracts.
33 As discussed in Interrogatories 7, 8, and 9, per-call blocking in the
34 DMS switch is an optional feature. This feature is available in the
35 initial DMS offering at a list price of _____ per switch (the above
36 discounts are applicable).

INFORMATION PROVIDED BY: George H. Grier
Staff Manager
25581 Southern Bell Center
Atlanta, Ga. 30375