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August 27, 1992

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

RE: Docket No. 910163-TL

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Request for Confidential Classification for Late Filed Exhibit No. 47 which we ask that you file in the above-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,

Sidney J. White, Jr.
Sidney J. White, Jr. 02

Enclosures

cc: All Parties of Record
A. M. Lombardo
H. R. Anthony
R. D. Lackey

DOCUMENT NUMBER-DATE
09772 AUG 27 1992
FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 910163-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 27th day of August, 1992 to:

Charles J. Beck
Assistant Public Counsel
Office of the Public Counsel
Room 812
111 W. Madison Street
Tallahassee, FL 32399-1400

Tracy Hatch
Division of Legal Services
Florida Public Svc. Commission
101 East Gaines Street
Tallahassee, FL 32399-0863

Sidney J. White, Jr.
SJ

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition on Behalf of)
Citizens of the State of Florida) Docket No. 910163-TL
to Initiate Investigation into)
Integrity of Southern Bell) Filed: August 27, 1992
Telephone and Telegraph Company's)
Repair Service Activities and)
Reports.)
_____)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION
FOR LATE FILED EXHIBIT NO. 47

COMES NOW BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), pursuant to Rule 25-22.006(4)(a), Florida Administrative Code, and submits its Request for Confidential Classification for certain information contained in Late Filed Exhibit No. 47.

1. During a panel deposition held on June 18 and 19, 1992, Public Counsel requested the production of certain documents and the provision of certain information. The parties agreed to a procedure whereby these documents and this information would be provided without the necessity of a formal request to produce and/or interrogatories. Specifically, there was an agreement that this information would be produced at a subsequent date as "late filed exhibits" to the deposition. One of these exhibits is Late Filed Exhibit No. 47.

2. Some of the information contained in Late Filed Exhibit No. 47 is confidential business information that should not be publicly disclosed. The chart on page 2 of 5 and 3 of 5 lists the LMOS software programs that had to be updated to correct the

DOCUMENT NUMBER-DATE

09772 AUG 27 1992

FPSC-RECORDS/REPORTING

troubles fixed by this generic update. This information exposes the internal structure of the software update and the computer system. An unauthorized user would be assisted in manipulating the files in the LMOS system. Southern Bell considers this to be highly sensitive proprietary confidential business information and goes to great length to protect this type of information from public disclosure in order to protect its computer systems. This type of document receives very limited distribution within the Company. Public disclosure of this information could bring great harm to the Company and its customers. The Company's installation and maintenance system for 9 states is administered through LMOS and the associated front and computers. If these systems were invaded by unauthorized individuals, great harm could be done to the Company's ability to provide proper installation and maintenance services.

3. Thus, pursuant to Rule 25-22.006(4)(a), Florida Administrative Code, Southern Bell moves the Prehearing Officer to issue an Order classifying Late Filed Exhibit No. 47 as confidential and exempting the information contained therein from § 119.07(1), Florida Statutes.

4. Southern Bell has appended to this request for confidential classification as Attachment A, a listing of the location in the documents of the information designated by Southern Bell as confidential. In any instances in which Southern Bell has requested that an entire document be granted

confidential classification, this representation will be included in place of specific location information.


5. Appended hereto in an envelope designated as Attachment B are two edited copies of the documents with the confidential information deleted.


6. A sealed package marked as Attachment C contains copies of the documents with the material which is confidential and proprietary highlighted. Copies of Attachment C are not being served on the other parties to this proceeding.

WHEREFORE, based on the foregoing, Southern Bell respectfully urges the Prehearing Officer to issue an Order classifying the identified portions of Late Filed Exhibit No. 47 as proprietary confidential business information.

Respectfully submitted this 27th day of August, 1992.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY


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ATTACHMENT A
FPSC DOCKET 910163-TL
LATE FILED EXHIBIT 47

A. JUSTIFICATION FOR CONFIDENTIAL REQUEST

The chart on page 2 of 5 and 3 of 5 of Late Filed Exhibit Number 47 lists the LMOS software programs that had to be updated to correct the troubles fixed by this generic update. This information exposes the internal structure of the software update and the computer system. An unauthorized user would be assisted in manipulating the files in the LMOS system. Southern Bell considers highly sensitive proprietary/confidential information and goes to great length to protect this type of information from public disclosure in order to protect its computer systems. This type of document receives very limited distribution within the Company. Public disclosure of this information could bring great harm to the Company and its customers. The company's installation and maintenance system for 9 states is administered through LMOS and the associated front and computers.

B. LOCATION OF PROPRIETARY INFORMATION
LATE FILED EXHIBIT 47

All of the information in the chart on pages 2 of 5 and 3 of 5 under the columns labeled "PATH", "SUM", "VERS", "OWNER", "GROUP", and "MODE" are considered proprietary business information. The proprietary information is further identified as being on the pages and lines as follows:

Page	Lines
2 of 5	7-45
3 of 5	2-24