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Southern Bell Telephone  
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October 5, 1992

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

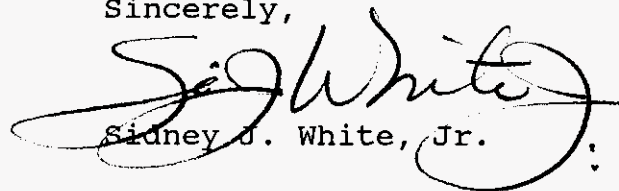
RE: Docket No. 920260-TL

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of the Supplemental Request for Confidential Classification for Southern Bell's Response to Item No. 53 of Staff's Third Set of Interrogatories. Please file these documents 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 on the parties shown on the attached Certificate of Service.

Sincerely,



Sidney J. White, Jr.

Enclosures

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

RECEIVED & FILED

EPSON

DOCUMENT NUMBER-DATE  
11536 OCT-5 1992  
FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE**  
**Docket No. 920260-TL**

I HEREBY CERTIFY that a copy of the foregoing has been furnished  
by United States Mail this 5th day of October, 1992 to:

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Motel Association

A handwritten signature in black ink, appearing to read "J. White", written over a horizontal line. The signature is stylized and cursive, with a large loop at the end. A colon is placed to the right of the signature.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of )  
the Revenue Requirements and Rate ) Docket No. 920260-TL  
Stabilization Plan of Southern )  
Bell Telephone and Telegraph ) Filed: October 5, 1992  
Company (Formerly FPSC Docket )  
Number 880069-TL) )  
\_\_\_\_\_ )

SUPPLEMENTAL REQUEST FOR CONFIDENTIAL CLASSIFICATION  
FOR SOUTHERN BELL'S RESPONSE TO ITEM NO. 53  
OF STAFF'S THIRD SET OF INTERROGATORIES

COMES NOW BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), pursuant to Rule 25-22.006, Florida Administrative Division Code, and files its Supplemental Request for Confidential Classification for the Company's response to Item No. 53 of Staff's Third Set of Interrogatories dated August 10, 1992.

1. On September 14, 1992, Southern Bell filed its Request for Confidential Classification for the Company's responses to Staff's Third Set of Interrogatories, Item Nos. 50, 52 and 53. In that Request, Southern Bell indicated that it would file an answer to Item No. 53 as soon as it was available.

2. Southern Bell is filing its Request for Confidential Classification for portions of Interrogatory Response No. 53, which contain certain limited information on an unregulated Company's operations, including forecasted net income, revenue, and itemized expense information. By providing this information, Southern Bell is not waiving its previous general objection to the relevance of information pertaining to unregulated products, services, or operations.

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11586 OCT -5 1992  
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3. Southern Bell has appended to this Request for Confidential Classification as Attachment A a listing showing the location in Interrogatory response Item No. 53 of the information designated by Southern Bell as confidential.

4. Appended hereto in an envelope designated as Attachment B are two edited copies of Interrogatory response Item No. 53 with the confidential information deleted.

5. Attached as Attachment C is a sealed envelope containing copies of Interrogatory response Item No. 53 with the material which is confidential and proprietary highlighted. Copies of Attachment C are not being served on the other parties in this proceeding.

6. Regarding Southern Bell's response to Interrogatory response Item No. 53, this response contains competitively sensitive information relating to the directory advertising operations of one of Southern Bell's unregulated affiliates, BellSouth Advertising and Publishing Company ("BAPCO"), and as such the information contained therein is proprietary confidential business information. This response contains forecasted unregulated revenues and expenses as well as net income information.

7. The directory advertising business is a competitive business, and companies participating in that market do not typically share their projected expenses, profit margins and projected revenue information with their competitors. Section 364.183(3)(e), Florida Statutes, specifically includes

"information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information" as proprietary confidential business information. Interrogatory response Item No. 53 specifically identifies forecasted expense categories and specific amounts for those categories, including printing costs, commissions paid for sales of directory advertising and other directory expenses. The cost structure and profitability of competitive enterprises is considered to be proprietary business information and is not generally shared publicly, and is certainly not shared directly with competitors of these companies. Knowledge of discrete elements in a competitor's cost structure, such as current and projected printing, commission and other costs in the context of the directory advertising business, would make it easier to estimate the competitor's overall costs which must be covered through advertising revenues. Consequently, knowledge of a competitor's costs could help in setting strategic advertising rates in certain markets subject to the greatest competition.

8. Interrogatory Response No. 53 contains forecasted revenue and expense information. Knowledge of another competitor's revenue and cost structure trends for the future clearly places the firm possessing such knowledge in a superior position relative to the other company. Such knowledge could be even more valuable to competitors than past information since it discloses a company's planned financial results and its expectations concerning competitive efforts. Accordingly,


disclosure would give others a competitive advantage which would result in competitive harm and impair the effectiveness of Southern Bell's unregulated affiliate's directory advertising business. If BAPCO's revenue stream were to be adversely affected, then Southern Bell's ultimate share of the fruits of BAPCO-related operations could also be diminished, resulting in an adverse impact on Southern Bell's regulated revenues in the State of Florida.

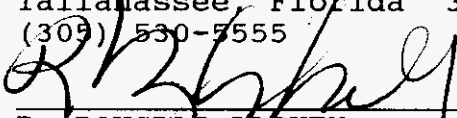
9. Southern Bell has treated and intends to continue to treat the material for which confidential classification is sought as private, and this information has not been generally disclosed.

WHEREFORE, based on the foregoing, Southern Bell moves the Prehearing Officer to enter an order declaring the information described above and contained in the indicated portions of the attachments to be confidential proprietary business information, and thus not subject to public disclosure.

Respectfully submitted this 5th day of October, 1992.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY

  
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FPSC DOCKET 920260-TL

FPSC STAFF'S 3RD INTERROGATORIES

**JUSTIFICATION FOR CONFIDENTIALITY REQUEST**

The confidential and proprietary information that is contained in Interrogatory 53 contains unregulated itemized expenses, net income, and forecasted revenues/expenses which the company considers Confidential Proprietary Business Information.

**LOCATION OF THE PROPRIETARY INFORMATION**

The following information identified by page and line numbers is considered confidential and proprietary:

INTERROGATORY

Nos.

Line Nos.

53 page 2 of 2

11-19