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December 10, 1992

Mr. Steve C. Tribble  
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Florida Public Service Commission  
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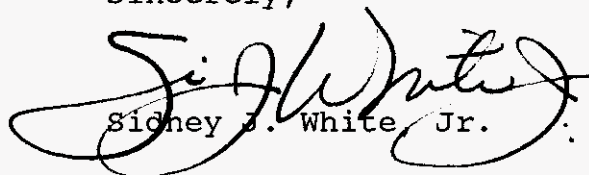
RE: Docket No. 920260-TL

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Request for Confidential Classification. Please file this document 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 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

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

I HEREBY CERTIFY that a copy of the foregoing has been furnished  
by United States Mail this 10th day of December, 1992 to:

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A handwritten signature in cursive script, appearing to read "J. White", with a horizontal line drawn through the middle 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: December 10, 1992  
Company (Formerly FPSC Docket )  
Number 880069-TL) )  
\_\_\_\_\_)

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

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 Request for Confidential Classification for certain information contained in documents provided to Staff in response to Staff's Seventh Request for Production of Documents dated October 15, 1992.

1. Southern Bell is filing its Request for Confidential Classification for portions of documents produced for Staff which contain intraLATA competitive scenario testing and analyses which contain the projected effects of possible events on Southern Bell's toll usage and revenues, as well as other attendant effects on other Company-provided services.

2. Southern Bell has appended to this Request for Confidential Classification as Attachment A a listing showing the location in the documents of the information designated by Southern Bell as confidential.

3. Appended hereto in a package designated as Attachment B are two edited copies of the documents with the confidential information deleted.

4. Attached as Attachment C is a sealed package containing copies of the documents with the material which is confidential

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and proprietary highlighted. Copies of Attachment C are not being served on the other parties in this proceeding.

5. With respect to documents produced for Staff in response to Request No. 108(e)<sup>1</sup>, the documents contain specific demand, revenue and other competitive scenario testing information relating to the intraLATA toll market. This information is entitled to confidential classification on the basis that it is information relating to competitive interests, the disclosure of which would impair Southern Bell's competitive intraLATA toll business if publicly disclosed. Section 364.183(3)(e), Florida Statutes, specifically provides that such information is proprietary confidential business information. The intraLATA toll market is competitive in the State of Florida. Interexchange carriers (IXCs) and resellers both compete with Southern Bell for intraLATA toll customers. Demand analyses and competitive scenario testing, together with projected results both in terms of revenue and usage of Southern Bell's services would be extremely valuable to Southern Bell's competitors. Obviously, if Southern Bell's competitors gain a competitive advantage through the free use of Southern Bell's market demand and competitive scenario information, such advantage will inure to the detriment of Southern Bell and ultimately its ratepayers.

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<sup>1</sup> This document request was originally contained in Staff's Ninth Set of Interrogatories, as a part of Item No. 312. Based on discussions between counsel for the Staff and Southern Bell, it was agreed that this document request would be more appropriately designated as Request No. 108(e) associated with the Staff's Seventh Request for Production. (See Southern Bell's Response and Objections to Staff's Seventh Request for Production of Documents, filed November 19, 1992.)


This information represents research and analyses compiled by Southern Bell which should not be given free of charge to entities which compete with Southern Bell. Southern Bell compiled and developed this information in order to assist it in analyzing this subject matter. Southern Bell's competitors should not be allowed to benefit from such competitive analyses at Southern Bell's expense.

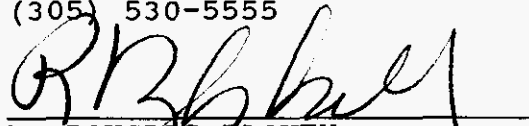
6. Southern Bell has treated and intends to continue to treat the material for which confidential classification is sought as private, and this information has not been generally disclosed.

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 10th day of December, 1992.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY

  
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