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FILED

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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| In re: Comprehensive Review of the |) | Docket No. 920260-TL |
| Revenue Requirements and Rate |) | Filed: January 19, 1993 |
| Stabilization Plan of Southern Bell |) | |
| Telephone and Telegraph Company |) | |

FIXCA'S REQUEST FOR CONFIDENTIAL CLASSIFICATION

The Florida Interexchange Carriers Association (FIXCA), pursuant to Rule 25-22.006, Florida Administrative Code, files its Request for Confidential Classification for its responses to Interrogatory Nos. 6-9 of Staff's Second Set of Interrogatories.

1. FIXCA is filing its Request for Confidential Classification for its responses to Interrogatories Nos. 6-9 because the responses contain proprietary, confidential business information of FIXCA members related to their competitive interLATA and intraLATA toll services.

2. One copy of the answers for which confidential classification is requested is included in a sealed envelope attached hereto as Attachment A and labeled "CONFIDENTIAL." On this copy, the specific information for which confidentiality is requested has been highlighted. Copies of Attachment A are not being served on the other parties to this proceeding.

3. One copy of the answers with the confidential information redacted are included in an envelope attached hereto as Attachment B. Copies of the redacted answers have been served on the parties of record as part of FIXCA's Responses to Staff's Second Set of Interrogatories.

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4. The highlighted information for which confidential classification is requested reflects FIXCA member's MTS-like traffic volumes (MOU) and revenues, broken down by mileage band and by business/residential usage, for both their interLATA and intraLATA services.

5. Both the interLATA and intraLATA toll markets are highly competitive arenas. The highlighted information discloses usage patterns and overall traffic volumes for different classes of FIXCA members' customers for major toll services. Competitors of FIXCA members could use this information -- in combination with publicly available information on FIXCA members' prices and product offerings -- to analyze the customer base of FIXCA members, to analyze the effectiveness of marketing strategies of FIXCA members, and to selectively target their own marketing efforts to respond to revealed strengths and/or weaknesses in the marketplace. The disclosure of this competitive toll market information would impair the ability of FIXCA members to compete effectively in the interLATA and intraLATA toll markets in Florida.

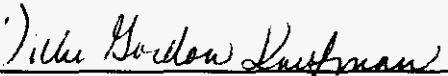
6. Section 364.183(3)(a),(e), Florida Statutes, expressly includes as proprietary confidential business information (i) trade secrets, and (ii) any information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. The information contained in FIXCA's responses to Interrogatory Nos. 6-9 meets both of these statutory criteria, as more fully described above, and is therefore entitled to confidential classification.

7. FIXCA members have treated and intend to continue to treat the material for which confidential classification is sought as private, and this information has not been publicly disclosed.

WHEREFORE, for the reasons stated above, FIXCA moves the Prehearing Officer to enter an order:

(a) declaring that the information provided by FIXCA in response to Interrogatory Nos. 6-9 of Staff's Second Set of Interrogatories constitutes confidential proprietary business information of FIXCA members, and is not subject to public disclosure; and

(b) directing that the information be returned to FIXCA at the conclusion of these proceedings.


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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the FIXCA's Request for Confidential Classification has been furnished by hand delivery* or by U.S. Mail to the following parties of record, this 19th day of January, 1993:

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